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SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SANTA BARBARA
SANTA MARIA BRANCH; COOK STREET DIVISION
DEPARTMENT SM-2 HON. RODNEY S. MELVILLE, JUDGE

THE PEOPLE OF THE STATE OF)
CALIFORNIA,)
Plaintiff,)
-vs-) No. 1133603
MICHAEL JOE JACKSON,)
Defendant.)

REPORTER'S TRANSCRIPT OF PROCEEDINGS

MONDAY, APRIL 11, 2005

8:30 A.M.

(PAGES 5517 THROUGH 5578)

REPORTED MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304
BY: Official Court Reporter 5517

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I N D E X

Note: Mr. Sneddon is listed as “SN” on index.
Mr. Zonen is listed as “Z” on index. Mr. Auchincloss is listed as “A” on index.
Mr. Nicola is listed as “N” on index. Mr. Mesereau is listed as “M” on index.
Ms. Yu is listed as “Y” on index. Mr. Sanger is listed as “SA” on index.
Mr. Oxman is listed as “O” on index.

PLAINTIFF’S WITNESSES	DIRECT	CROSS	REDIRECT	RECROSS
JONES, Bob	5522-A	5540-M	5558-A	5561-M
	5563-A			
(Further)				
BROWN, Stacy	5564-A			

1 E X H I B I T S
2 FOR IN
3 PLAINTIFF'S NO. DESCRIPTION I.D. EVID.
4 803 On-page document dated
5 March 7, 2005 5536
6 804 E-mail 5538
7 805 E-mail 5538
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Santa Maria, California
Monday, April 11, 2005
8:30 a.m.

(The following proceedings were held in open court in the presence and hearing of the jury:)

THE COURT: Good morning.
THE JURY: (In unison) Good morning.
COUNSEL AT COUNSEL TABLE: (In unison) Good morning, Your Honor.
THE COURT: Ready to proceed?
MR. AUCHINCLOSS: Yes, Your Honor. People call Bob Jones.
THE COURT: Remain standing, please. Face the clerk here and raise your right hand.

BOB JONES
Having been sworn, testified as follows:

THE WITNESS: So help me God.
THE COURT: Please be seated. State and spell your name for the record.
THE WITNESS: Bob Jones. B-o-b; J-o-n-e-s.
THE CLERK: Thank you.
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1 DIRECT EXAMINATION
2 BY MR. AUCHINCLOSS:
3 Q. Good morning, Mr. Jones.
4 A. Good morning.
5 Q. Mr. Jones, in your employment history, have
6 you ever worked for Michael Jackson?
7 A. Yes.
8 Q. And is he the man seated to my right with
9 the long black hair?
10 A. Yes, he is.
11 Q. What did you do for Michael Jackson?
12 A. I was vice-president of communications and
13 community relations.
14 Q. And when did you begin working in that
15 capacity for Mr. Jackson?
16 A. 1987.
17 Q. Can you tell me a little bit about what that
18 title involves in terms of work?
19 A. Dealing with the media, and the community,
20 and various other assignments.
21 Q. Such as?
22 A. Whatever came up. Getting -- arranging to
23 get awards, arranging for coverage in newspapers,
24 magazines. Assisting in the -- with the fan clubs,
25 et cetera.
26 Q. All right. Would it be fair to say that you
27 were the man in charge of public relations --
28 A. Yes. 5522

Q. -- for Michael Jackson?
A. Yes.
Q. And how many years did you work for Mr. Jackson?
A. 16 and a half.
Q. And how did your employment come to an end?
A. I received a letter one day saying that, "Thank you for your services. They're no longer needed."
Q. Did you ever receive any explanation as to why you were being terminated?
A. That, "We were restructuring" --
MR. MESEREAU: Objection; hearsay.
THE WITNESS: -- "and going in a different direction." That was in the letter.
THE COURT: Just a moment. Just a moment, please.
THE WITNESS: I don't know what you're saying.
THE COURT: All right. I'm going to overrule the objection, but I'll limit the examination in that area.
Q. BY MR. AUCHINCLOSS: All right. As far as your understanding as to why you were being terminated, can you tell us what you believe to be the reason why you were being terminated?
A. Well, I can only cite the letter that I received. 5523

MR. MESEREAU: Objection. No foundation;
and irrelevant opinion.
MR. AUCHINCLOSS: I'll rephrase it.
THE COURT: All right.
Q. BY MR. AUCHINCLOSS: Were you informed as to
the reason for your termination with Michael Jackson
as his man in charge of public relations?
A. No, because at all times --
MR. MESEREAU: Objection; nonresponsive.
THE COURT: I'll allow the answer, "No."
Q. BY MR. AUCHINCLOSS: All right. So you were
never given an explanation as to why you were being
terminated?
A. At all times --
Q. That's a yes or no, question, sir.
MR. MESEREAU: Objection; nonresponsive.
THE COURT: Overruled. The question was,
"All right. So you were never given an explanation
as to why you were being terminated?" Is that true?
THE WITNESS: The letter, yes. The letter.
That's all I can say.
Q. BY MR. AUCHINCLOSS: Okay. Now, one thing
we have to be careful about in the question and
answer of your examination is we have to be careful
we don't talk over each other, so the reporter can
get everything down.
A. Okay.
Q. And you have to be careful just to answer 5524

the question that's asked. All right?
A. Okay.
Q. Thank you.
So I believe you testified you were
terminated late in 2004; is that correct?
A. Yes.
Q. And since that time have you had any
employment?
A. No.
Q. Have you been involved in any activity at
this time concerning -- during that period of time
since your termination that concerns your years of
employment with Michael Jackson?
A. Yes.
Q. What is that?
A. I went to the State of California and filed
a complaint for my vacation pay.
Q. All right. Other than that, have you been
involved in the writing of any memoirs of your years
with Michael Jackson?
MR. MESEREAU: Objection; leading.
THE COURT: Overruled.
THE WITNESS: Is it --
THE COURT: You may answer.
THE WITNESS: Yes.
Q. BY MR. AUCHINCLOSS: And can you
specifically tell me what you've been doing in terms
of writing those memoirs? 5525

A. Preparing a book.
Q. Preparing a book?
A. Yes.
Q. And what is the subject matter of that book?
A. My -- well, my years and -- my years with Michael Jackson.
Q. During your years of working with Michael Jackson, did you have occasion to spend time with him personally?
A. Seldom.
Q. Who was it that hired you?
A. Michael Jackson.
Q. Personally?
A. Yes.
Q. And did you ever travel with him?
A. Yes.
Q. On how many occasions?
A. I think on three tours, and perhaps on special occasions for events that I had arranged, such as the World Music Awards.
Q. Where was the World Music Awards?
A. Monaco.
Q. In Europe?
A. Yes.
Q. And when was that?
A. Now, I can't tell you an exact date. I'm not good on dates.
Q. All right. Can you approximate? 5526

A. I would say approximately ‘92.
Q. How long did that trip take?
A. The trip probably lasted about ten days.
Q. And did you travel with Mr. Jackson to Monaco?
A. Yes.
Q. Did Mr. Jackson bring any guests with him on that trip?
A. Yes.
Q. Who?
A. Jordie Chandler, his mother June Chandler, and her sister -- his -- Jordie’s sister.
Q. Did you personally see Mr. Jackson and Jordie Chandler together during that trip?
A. Of course.
Q. How often?
A. We -- well, whenever I saw one, I saw the other.
MR. AUCHINCLOSS: If I may approach, Your Honor.
THE COURT: Yes.
Q. BY MR. AUCHINCLOSS: Mr. Jones, I show you People’s Exhibit 776. Can you identify that for me, please?
A. That’s Jordie Chandler.
Q. Now, you said whenever you saw Mr. Jackson, you saw Jordie Chandler with him?
A. Yes. 5527

Q. How often would you see Mr. Jackson during that trip?
A. Well, I would say, doo-doo-doo-doo, in Monte Carlo maybe I saw them three or four times.
Q. Did you travel on the plane with them to Monaco?
A. Most definitely.
Q. Did you travel on the plane with them back to the United States?
A. I -- yes, I traveled on the plane with them from Monte Carlo to Paris, and then back to the United States.
Q. Did Mr. Jackson attend the World Music Awards?
A. Yes, he did.
Q. Did you see him there?
A. Yes.
Q. Did you ever see Mr. Jackson personally demonstrate any physical affection towards Jordie Chandler during this period?
MR. MESEREAU: Objection; leading.
THE COURT: Sustained.
Q. BY MR. AUCHINCLOSS: Did you ever see any conduct involving any physical contact between Michael Jackson and Jordie Chandler?
A. Yes.
Q. How often?
A. On the flight back from -- 5528

Q. The question is, first of all, how often did you see this?
A. Well, just the one time.
Q. And you started to talk about the flight back?
A. Well, that's when the -- can I make a correction?
Q. Yes.
A. Number one, I saw them together at the awards. And then on the flight back from Paris to Los Angeles.
Q. Okay. Were they in physical contact with one another at the awards?
A. He sat -- yes.
Q. And can you describe -- were they in physical contact during the flight back?
A. They were embraced into one another on -- sleeping on the airplane from Paris to Los Angeles.
Q. Now, going to the music awards, what was the nature of the physical contact that you saw with them at the World Music Awards?
A. Jordie sat on his lap.
Q. Where were you seated?
A. I sat a distance away from June, her daughter, and Jordie and Michael.
Q. How many feet away were you when you were observing Mr. Jackson and Mr. Chandler together?
A. Oh, I would say approximately 20 feet. 5529

Q. And if you would describe for me in detail what you saw at the World Music Awards involving Mr. Chandler and Jackson?
A. Well, during the performance, he sat on his lap, Jordie sat on his lap. And the sister sat on the other lap, but at one time Linda Evans took the girl off of his lap and let her sit on her lap.
Q. Mr. Jones, during the World Music Awards when you were watching Mr. Jackson and Jordie Chandler sitting together, did you ever see Mr. Jackson lick Jordie Chandler's head?
A. No, sir.
Q. Have you been interviewed by police officers concerning this matter?
A. Not that I recall.
Q. Didn't you have an interview with Steve Robel and your attorney and myself last week in the victim/witness room --
A. Yes.
Q. -- concerning this incident?
A. Yes, yes, yes.
Q. At that meeting, didn't you tell Mr. Robel and myself and your attorney that you weren't sure if that happened?
A. I was very --
MR. MESEREAU: Objection.
THE WITNESS: I was adamant in saying I was not sure that that happened. I could -- I could 5530

definitely say that they were embraced in one another's arms on the flight, but I don't recall anything about head licking.
Q. BY MR. AUCHINCLOSS: My question is, didn't you say that you didn't remember that, but you weren't sure whether or not Mr. Jackson licked Jordie Chandler's head?
MR. MESEREAU: Objection. Leading, and argumentative, and misstates the evidence.
MR. AUCHINCLOSS: This is impeachment, Your Honor.
THE COURT: The objection is overruled.
You may answer.
THE WITNESS: I might have said that. But I don't recall.
Q. BY MR. AUCHINCLOSS: You don't recall whether you said that?
A. No, I don't recall ever seeing any head licking, and I made that as adamant as I could.
Q. All right. So is it your testimony today that you don't have a recollection of the head licking --
MR. MESEREAU: Objection. Argumentative, and asked and answered, and leading.
MR. AUCHINCLOSS: I don't think I've gotten an answer yet.
THE COURT: Well, you haven't got the question out, so go ahead and state your question. 5531

Q. BY MR. AUCHINCLOSS: I'm trying to clarify
the state of your memory, sir.
A. Sure.
Q. Is it your testimony today that you do not
remember whether or not you saw any head licking?
A. No. I don't remember having seen any head
licking.
Q. Okay. So is it fair to say you were not
saying it couldn't have happened?
MR. MESEREAU: Objection; argumentative.
THE COURT: Sustained.
MR. MESEREAU: Calls for speculation.
Q. BY MR. AUCHINCLOSS: Are you saying you just
simply do not have a recollection of it?
MR. MESEREAU: Objection. Asked and
answered; argumentative; and leading.
THE COURT: Sustained.
Q. BY MR. AUCHINCLOSS: Mr. Jones, you said
you're writing a book in this case?
A. Sure.
Q. What is the title of that book?
A. "The Man Behind the Mask."
Q. What is the complete title of that book?
A. "The Man" --
MR. MESEREAU: Objection. Objection.
Hearsay; relevance.
THE COURT: Overruled.
You may answer. 5532

THE WITNESS: Oh. “The Man Behind the Mask.” In all honesty, I don’t -- I can’t tell you the subtitle.
Q. BY MR. AUCHINCLOSS: You don’t recall the name of your book?
A. No, I don’t recall the subtitle. I do know “An Insider’s View of the Rise and Fall of the King of Pop.” Maybe that’s it.
Q. Is the name of your book, “Michael Jackson, The Man in the Mirror, An Insider’s Account of the King of Pop’s Spectacular and Catastrophic Fall from Grace”?
THE WITNESS: No.
MR. MESEREAU: Objection. Leading; hearsay.
Q. BY MR. AUCHINCLOSS: That is not the title of your book?
A. The “Catastrophic” --
THE COURT: Just a moment. There’s an objection.
It’s overruled.
MR. AUCHINCLOSS: All right.
THE WITNESS: “Catastrophic Fall” was taken out. It was a suggested title and I took that “Catastrophic” out. And it isn’t “The Man Behind the Mirror.” It’s “The Man Behind the Mask.” Maybe one of the suggested titles was that other that I did not approve of.
Q. BY MR. AUCHINCLOSS: Is your book presently 5533

at the publisher?
A. It is being edited, but the book is not complete. It is far from complete.
Q. Is your book presently at the publisher?
A. Yes, sir.
Q. What's the name of that publisher?
A. System, I think. My co-writer handled that end of it.
Q. And your book is currently being edited?
A. Yes.
Q. Has it been accepted by the publisher as a prospect for publication?
A. It has been, but it has not been approved by me.
Q. The manuscript that is at the publisher -- well, let me strike that.
Is the book that is being reviewed by your publisher currently an honest account of your years working with Michael Jackson?
MR. MESEREAU: Objection. Calls for speculation; irrelevant opinion.
THE COURT: Sustained.
Q. BY MR. AUCHINCLOSS: Have you reviewed the manuscript that is at the publisher's?
A. I have looked at a manuscript that has not been approved by me.
Q. How many times have you looked at this manuscript? 5534

MR. MESEREAU: Objection; relevance.
THE COURT: I'm not sure where you're going with this. Are you -- is it your intent to impeach him with his manuscript, is that what you're --
MR. AUCHINCLOSS: Yes.
THE COURT: All right. The objection is overruled.
THE WITNESS: Perhaps I've looked at it twice and I have -- I have a co-writer.
Q. BY MR. AUCHINCLOSS: Okay. This manuscript that you've looked at, is it fact or fiction?
A. It's part --
MR. MESEREAU: Objection; no foundation. There's a co-writer. It's not been approved. It's being edited by some other people.
MR. AUCHINCLOSS: I'm talking about the manuscript he's looked at.
THE COURT: Objection's overruled.
Q. BY MR. AUCHINCLOSS: Is this a factual manuscript or is it a fictional manuscript?
A. It is factual to a degree.
Q. To what degree is it factual?
A. It's to a degree, because I -- my co-writer also has included things that I didn't approve of.
Q. I'm going to read to you a quote from that manuscript and ask you whether it's factual or fiction.
A. Sure. 5535

MR. MESEREAU: Objection. Can we approach the bench, Your Honor?
THE COURT: Just a moment.
Before you can impeach him with the manuscript, you have to establish a foundation that he, in fact, wrote this part that you want to impeach him with.
I'll allow you to approach the witness and show it to him, but I'm not going to allow you to read in open court something that may have been written by somebody else.
MR. AUCHINCLOSS: That's fine, Your Honor.
Q. Mr. Jones, I show you People's Exhibit No. 803. It appears to be one page of typed -- this is a word-processed document.
A. Okay.
Q. And it's dated March 7th, 2005. There are two paragraphs below the exhibit number. If you'd read those two paragraphs, I'm going to ask you a couple of questions about it.
A. Sure. "He's one of the young" --
Q. Just a moment. Just read them silently.
A. Oh. Okay.
I did not write this. This I did write.
Q. All right.
THE COURT: So did he show you one he wrote and one he didn't write?
MR. AUCHINCLOSS: Yes. And for the record, 5536

he indicated --
Q. If I'm accurate, Mr. Jones, you indicated the first paragraph in the lower portion of the page you didn't write, but the second paragraph you did write?
A. Yes.
THE COURT: Is that clear to you which he indicated, Counsel?
MR. MESEREAU: I think so, but I'd like to talk to the prosecutor first. I think I understand.
Q. BY MR. AUCHINCLOSS: All right. That second paragraph -- Mr. Jones, that second paragraph is an account of what you observed at the World Music Awards; is that accurate?
A. That's what I observed on the airplane.
Q. Okay. In that paragraph, it states --
MR. MESEREAU: Objection; hearsay.
MR. AUCHINCLOSS: It's impeachment. And I can show it to you, Your Honor.
THE COURT: The objection's overruled.
Q. BY MR. AUCHINCLOSS: It states, "I looked at what was going on with the king and the boy." Who is "the king" in your --
A. The king of pop, Michael Jackson.
Q. All right. "Others looked at them rather strange, too. They were holding each other tight, almost in a romantic sense, cooing. There were pecks on the cheeks and licks on the top of the 5537

1 head."
2 Those are your words, sir, true?
3 A. Sir --
4 Q. That's a "yes" or "no" question.
5 A. Yes, with reservations.
6 Q. Mr. Jones, did you see Michael Jackson lick
7 Jordie's head?
8 MR. MESEREAU: Objection; asked and
9 answered.
10 THE COURT: Sustained.
11 MR. AUCHINCLOSS: If I may approach, Your
12 Honor.
13 THE COURT: Yes.
14 Q. BY MR. AUCHINCLOSS: Mr. Jones, I show you
15 People's Exhibit 804. It appears to be an e-mail.
16 Can you identify that for me, please?
17 A. It's from an e-mail that I sent to Stacy
18 Brown, my co-writer.
19 Q. The cite -- well, I won't quote, but that is
20 your e-mail address at the top?
21 A. Yes, yes.
22 Q. And those are your words?
23 A. If they were sent by my e-mail, yes, they
24 have to be my words.
25 Q. You don't dispute that those are your words?
26 A. No.
27 Q. And I show you People's Exhibit No. 805. If
28 you'd identify that for me, please. Also appears to 5538

1 be an e-mail dated the same date, but the time on it
2 is 22:30:17 EDT.
3 The first one, for identification purposes,
4 804, is dated -- the time on it is 19:55:32 EDT.
5 Okay. So showing you Exhibit 805, is that
6 one of your e-mails, sir?
7 A. Well, they're both from my e-mail.
8 Q. All right. You wrote them?
9 A. Yes.
10 Q. And in the first e-mail, 804 --
11 MR. MESEREAU: Objection; hearsay.
12 MR. AUCHINCLOSS: Offered as impeachment.
13 THE COURT: All right. Overruled.
14 Q. BY MR. AUCHINCLOSS: You wrote -- and
15 this -- first of all, let me ask you, is the date of
16 this e-mail accurate, October 30th, 2004?
17 A. I would imagine it is, sir.
18 Q. In that e-mail, you wrote, "Stacy: The
19 licking is going to be important because he did it
20 in this case, too." Are those your words, sir?
21 A. Apparently so.
22 Q. And in the e-mail that was dated the same
23 day just a few hours later, did you write, "Stacy:
24 The stuff with Jordie will bite him big"?
25 A. If it's -- if it came from my e-mail, I
26 wrote it. But I don't -- that sounds a little
27 strange from my writing.
28 MR. AUCHINCLOSS: Thank you. I have no 5539

1 further questions.
2 THE COURT: Cross-examine?
3 MR. MESEREAU: Yes, please, Your Honor.
4
5 CROSS-EXAMINATION
6 BY MR. MESEREAU:
7 Q. Good morning, Mr. Jones.
8 A. Good morning.
9 Q. My name is Tom Mesereau and I speak for
10 Michael Jackson.
11 A. Sure.
12 Q. We haven't met before, right?
13 A. No.
14 Q. Okay. The prosecutor referred to an
15 interview that you had with Sergeant Steve Robel and
16 another officer on April 7th, 2005.
17 A. Uh-huh.
18 Q. Do you remember that?
19 A. Yes.
20 Q. And do you remember you were asked by an
21 officer, "Um, did you see Mr Jackson engage in any
22 head licking in the World Music Awards?" And your
23 answer was, "No, no, no," right?
24 A. Uh-huh.
25 Q. And then you were asked, "Um, did you see
26 Mr. Jackson engage in any head licking of anybody?"
27 And your answer was, "Never." Remember that?
28 A. I recall. 5540

Q. Okay. And what you were not -- when you were dealing with your co-writer and publisher, you were not under oath, were you?
A. No.
Q. And of course today you are, right?
A. Yes.
MR. AUCHINCLOSS: Objection; argumentative.
THE COURT: Overruled. Next question. He answered that.
Q. BY MR. MESEREAU: The reality is, Mr. Jones, you have repeatedly said you don't recall seeing head licking on the plane, right?
MR. AUCHINCLOSS: Objection; misstates the evidence.
THE COURT: Sustained.
Q. BY MR. MESEREAU: You don't recall seeing head licking by Michael on the plane with Jordie, do you?
A. I said it, but it was in the -- it appeared in an e-mail. I said I did not recall seeing it, but it -- apparently so, because it appeared in an e-mail that came from my machine.
Q. Well, in response to the prosecutor's questions, you said you had reservations about that statement --
A. Yes.
Q. -- correct?
And what are your reservations about that 5541

1 statement?
2 A. That I just don't recall exactly seeing
3 that. I truly don't.
4 Q. And would you agree when you're working with
5 a co-writer and a publisher to prepare a book about
6 Michael Jackson, there's pressure to make things
7 sensational when you can, right?
8 A. Yes.
9 Q. And your publisher and others want a book
10 that can sell, correct?
11 A. My co-writer. The publisher wasn't involved
12 in that particular end of it.
13 Q. Okay. And certainly, having worked with
14 Michael all those years, you've seen numerous
15 attempts by numerous people to sensationalize
16 aspects of Michael's life, right?
17 A. Correct.
18 Q. And if you're writing a book about Michael,
19 there certainly is always a temptation to
20 sensationalize if you don't watch yourself, right?
21 MR. AUCHINCLOSS: Objection; argumentative.
22 THE COURT: Sustained.
23 Q. BY MR. MESEREAU: How is the book being
24 written?
25 A. Well, I don't quite understand what
26 you're --
27 Q. Let me rephrase it. It's probably a poor
28 question. 5542

1 You have a co-writer?
2 A. That's correct.
3 Q. Did your co-writer ever work for Michael
4 Jackson?
5 A. No, but my co-writer knows the family.
6 Q. Okay. And you're both trying to prepare a
7 book about your observations and experiences in the
8 past, right?
9 A. Yes.
10 Q. And the prosecutor asked you some questions
11 about what stage it's in, right?
12 A. Yes.
13 Q. And is there considerably more editing
14 required?
15 A. Most definitely.
16 Q. And is it a long ways from being published
17 as far as you're concerned?
18 A. As far as I am concerned, and I'm supposed
19 to have final approval.
20 Q. And when you have a co-writer on a book like
21 that -- actually, let me make it more direct.
22 Does your co-writer have responsibility for
23 preparing drafts that you have to then review for
24 accuracy?
25 A. That is correct.
26 Q. Okay. And is it -- would it be appropriate
27 to say that what the prosecutor showed you has not
28 been approved for accuracy? 5543

MR. AUCHINCLOSS: I'm going to object to any further leading of this particular witness, Your Honor.
THE COURT: Overruled.
You may answer. Do you want the question read back?
THE WITNESS: Would you repeat the question, please?
THE COURT: I'll have the court reporter read it back.
(Record read.)
THE COURT: Are you talking about Exhibit 803, Counsel, or not?
MR. MESEREAU: Yes, Your Honor.
THE COURT: You need to show it to him, because he's been shown three exhibits.
MR. MESEREAU: I don't know -- are the exhibits in front of you, Mr. Jones?
THE WITNESS: Exhibits? I don't have anything.
THE COURT: They're not up there.
MR. MESEREAU: May I approach, Your Honor?
THE COURT: You may.
Q. BY MR. MESEREAU: Mr. Jones, I'm showing you what has been marked as Exhibit No. 803, okay? Do you see that?
A. Uh-huh.
Q. That starts off with a title that you said 5544

1 is not accurate and has not been approved, correct?
2 A. That is correct.
3 Q. And you told the prosecutor you had written
4 the words at the bottom of the page that refer to
5 licking, right?
6 A. Uh-huh.
7 Q. And is it your testimony that you have not
8 approved the accuracy of that statement?
9 A. That is correct.
10 Q. Okay. Now, the prosecutor showed you an
11 e-mail that you indicated you think you sent; is
12 that correct?
13 MR. AUCHINCLOSS: Objection; misstates the
14 evidence.
15 THE COURT: Overruled.
16 Q. BY MR. MESEREAU: Do you see that?
17 A. Personally I don't think this is in the
18 book, this statement.
19 MR. AUCHINCLOSS: I'll object as
20 nonresponsive.
21 THE COURT: I guess it's without -- his
22 answer shows me it's without foundation. So do you
23 want to ask a foundational question on that?
24 MR. MESEREAU: Yes.
25 Q. Mr. -- well, let me just show you. I'm
26 looking now at Exhibit 805, okay? And that's the
27 e-mail the prosecutor referred to.
28 A. Uh-huh. 5545

Q. And I think you said you believe you sent the e-mail; is that right?
A. Uh-huh.
Q. And are the words in that e-mail accurate as far as you're concerned?
A. Perhaps they are.
Q. You don't know?
A. Because I wrote -- if it came from my e-mail address, I had to write it.
Q. Okay. And -- but you don't know for sure?
A. No.
Q. And are the words on that e-mail words you intend to include in your book?
A. Not like that. My -- my co-writer is handling that, and I have tried to change certain things in the way things were said on numerous occasions with him.
Q. Would it be accurate to say that neither Exhibit 803 nor Exhibit 805 are accurate as far as you're concerned?
MR. AUCHINCLOSS: Objection; misstates the evidence --
THE COURT: Overruled.
MR. AUCHINCLOSS: -- as far as to 803.
THE COURT: Overruled.
You may answer.
THE WITNESS: Well, I don't know which one -- you got three different things there, don't 5546

you?
MR. MESEREAU: Sure.
May I approach, Your Honor?
THE COURT: Yeah.
Q. BY MR. MESEREAU: Showing you Exhibit 803
and Exhibit 805, okay?
A. This is three. This is five.
Q. Yes. Okay? Let's talk about 803. You've
already indicated the title -- what purports to be
the title is not going to be the title of your book,
right?
A. That's correct.
Q. And you've already indicated that the bottom
paragraph that you say you wrote is not accurate; is
that correct?
A. Uh-huh. This I wrote.
Q. Yes.
A. Yes.
Q. But you're indicating it's not accurate,
true?
MR. AUCHINCLOSS: Objection; misstates the
evidence.
THE COURT: Overruled.
You may answer.
THE WITNESS: Not completely true as far as
I'm concerned.
Q. BY MR. MESEREAU: Okay. Let's look at the
next exhibit, which is Exhibit No. 805. Do you see 5547

that?
A. Yes. This -- this one is true. I'm sorry.
Yes. I'm sorry.
Q. And you wrote that e-mail, correct?
A. Yes. Yes.
Q. And what you said in the e-mail was, in
summary, that you might -- and correct me if I'm
wrong, that you thought your knowledge of the
Chandlers might be an insurance policy for you?
A. Uh-huh.
Q. Correct?
A. Uh-huh.
Q. An insurance policy of employment, right?
A. Uh-huh.
Q. And what that means is, "I might try and
hold over Michael's head what I could say about the
Chandlers," right?
MR. AUCHINCLOSS: I'm going to object to
counsel ascribing any meaning to those words.
THE COURT: Sustained.
Q. BY MR. MESEREAU: What did you mean by
"insurance policy of employment"?
A. Well, I was not -- I did not have a
confidentiality agreement.
Q. Okay.
A. That's what I -- that's what I basically
meant.
Q. And did you also mean that, "Because I've 5548

spent all these years with Michael, that I could almost use as a threat writing an expose of him if I'm not employed by him"?
MR. AUCHINCLOSS: Same objection. And argumentative.
THE COURT: Overruled.
You may answer.
Q. BY MR. MESEREAU: Is that sort of what it means?
A. No, not really, because I have never -- I have never sued, I have never sold stories. I have never -- in the 16 and a half years, I've never attempted to extort in any manner.
Q. And I'm not saying you did. I'm just asking you --
A. No, no, I did not mean it in that respect.
Q. Okay. Now, when did you say your work was terminated?
A. June 9th, 2004.
Q. Okay. And where was your office at the time?
A. In my home.
Q. You indicated in response to the prosecutor's question that you didn't see Michael very often, right?
A. No.
Q. And why was that?
A. This was -- this was Michael Jackson's modus 5549

operandi from the very beginning. I saw Michael mostly if we were on a tour that my presence -- if I may explain. I have worked in the entertainment industry prior to working with Michael Jackson for 17 and a half years, and I know familiarity breeds contempt. And the further you stay away from artists, the better off you are.
Q. And for that reason, did you not go to Neverland very much?
A. I went to Neverland when I brought groups up, such as the Challengers Boys & Girls Club. Such as the First AME Church, et cetera. I was not a regular visitor at Neverland at all.
Q. Now, who was the first group that you mentioned that you brought?
A. The Challengers Boys --
MR. AUCHINCLOSS: Objection. Relevance; beyond the scope.
THE COURT: Sustained.
Q. BY MR. MESEREAU: In a typical year, while you were employed, how often would you visit Neverland?
A. I haven't been to Neverland in years. My visits to Neverland were on a more frequent basis about five years ago when I was able to get groups approved to go to Neverland.
Q. Okay. And you had an office located where?
A. Before we closed the offices, we were at 5550

9255 Sunset Boulevard.
Q. Okay. And how many years did you spend in that office?
A. I think we were there approximately ten years, I think. I cannot be for certain.
Q. Okay. Now, you indicated at the music awards, the World Music Awards, that at one point you saw Jordie on Michael Jackson's lap and his sister on Michael Jackson's lap together, right?
A. That is correct.
Q. Okay. And where was Michael Jackson sitting in that event?
A. He was seated on the front row next to Prince Albert of Monaco, and -- on one side, and Linda Evans, the actress, on the other side. And I attempted to get -- I had arranged for the Chandlers to sit directly behind Mr. Jackson, because I did not feel that the royalty wanted to be bothered with those guests. But he insisted that they sit with him, so I left it alone.
Q. Did the mother sit with Michael Jackson as well?
A. Behind.
Q. Okay. So when you saw the brother and sister sitting on Michael Jackson's lap in the first row, the mother was right behind, correct?
A. Correct.
Q. So this is the first row in full view of 5551

everyone at the awards show, correct?
A. That is correct.
Q. There was no effort to hide anything at any time?
A. No.
Q. At some point, did you see the children with their mother behind where Michael Jackson was sitting?
A. When I brought them in to their seats, they were seated behind Mr. Jackson. Mr. Jackson moved them up front.
Q. Okay. Did -- when you say he moved them up front, did he move them into seats up front?
A. He moved them into his seat.
Q. Okay. Okay. So the children moved into his seat to sit with him?
A. With him.
Q. And the mother still stayed sitting behind?
A. That is correct.
Q. And at some point did you see the children go back with their mother or did they always stay with Michael?
A. No, they stayed up there.
Q. And I think at one point you saw Jordie still sitting on Michael's lap, and Jordie's sister sitting on Linda Evans' lap?
A. That is correct.
Q. Please tell the jury what the World Music 5552

Awards show is.
A. The World Music Awards show is a show that's given annually in Monte Carlo for the best record sales in -- the best worldwide record sales.
I had arranged for Mr. Jackson to be honored by the World Music Awards, and -- because of his record sales. And we had gone there for that particular purpose, for him to be honored by the World Music Awards. And to be seen around the world. And I attempted, because perception is 90 percent of what the public thinks, to get those people off of his lap.
Q. Did the Chandler family seem to remain during the entire show sitting with Michael?
A. Oh, of course. Yes.
Q. Okay. Now, you -- how did you get to Monaco?
A. We flew.
Q. Did you -- fly from where?
A. Los Angeles.
Q. Okay. And were there other stops on that trip?
A. To Paris. We flew from Los Angeles to Paris, and Paris to Nice, and we helicoptered to Monte Carlo.
Q. Okay. Do you recall attending any other events with Mr. Jackson on the trip to Monaco?
A. Of course, His Royal Highness Prince Albert 5553

hosted a reception for visiting dignitaries, and I was -- he had an event -- when you go there, they have an event each night for visiting dignitaries. And there was only one event that Mr. Jackson attended.

Q. And do you recall whether or not the Chandler family were at that event?

A. They were with him.

Q. And that was because Michael insisted that the Chandler family go?

A. I don't know whether he insisted whether they attend or not.

Q. Okay.

A. But all of his guests were invited.

Q. Okay. Were there any other guests of Michael Jackson that you haven't named?

A. No, just the Chandler family.

Q. Okay. Now, did you begin writing your book after your employment ended?

A. I had made notes on certain things. Yes, the actual beginning of the writing of the book started after my employment ended, yes.

Q. And has there been an effort by you or your co-writer to market the book overseas?

A. Well, I would imagine that the publisher has.

Q. Has there been an attempt to market it in the United States? 5554

A. I would imagine that the publisher has.
Q. Okay. And who is in charge of that issue?
A. My co-writer.
Q. Okay. Now, do you typically meet with your co-writer periodically?
A. We talk on the phone. That's -- that's perhaps one of the reasons there is some confusion, because our -- he's based in New York and I'm based in Los Angeles.
Q. Okay. And do you sort of fax or e-mail manuscripts to one another?
A. We e-mail.
Q. Okay. And do you then typically correct or change what you think is either inaccurate or inappropriate?
A. Oh, I've changed millions of things that were inaccurate that I didn't say.
Q. And how far away from having a product that you think is accurate and complete are you?
A. I would say six to eight weeks.
Q. Okay. Have you come up with a date during which you intend to announce the availability of the book?
A. No.
Q. Okay. Do you remember in your interview on April 7th, 2005, a police officer asking you about whether or not there was any licking on the plane by Michael, and you said, "I just don't remember and I 5555

would be lying to say that I did”?
A. Of course I recall saying that.
Q. And that was the truth, right?
A. Yes.
Q. Now, on the plane coming back, do you remember where Jordie’s mother June was seated?
A. Sure.
Q. Where was she seated?
A. We were all in first class, and on one side of the rear of first class was Michael and Jordie Chandler. On the total opposite side was June Chandler and her daughter.
Q. Certainly June and her daughter were in a position to observe Michael and Jordie, correct?
A. That is correct.
Q. So they were seated parallel to one another?
A. Yes.
Q. Nothing that went on was hidden from anybody, correct?
A. No.
Q. And where were you seated in relation --
A. I was seated at least two front -- two rows ahead of them.
Q. How many times have you been contacted by any representative of the sheriffs or police department in this case?
A. Well, I was contacted prior to my registration -- I mean, my being served with a 5556

subpoena. And at one point, a Richard Steingard, I approached him about representation because he had represented me before in this case, and then he came back and said that he could not represent me any longer. And that's when Attorney Sachs was contacted. So I had been -- they attempted to serve a subpoena to me, and at that time I did accept the subpoena at Richard Steingard's office, and following which he informed me that he could no longer represent me.

Q. Have you ever spoken to any prosecutor for the government in this case directly?

A. Who do you mean, the government?

Q. These people. The prosecutors.

A. Certainly. I've -- Mr. Auchincloss and Steve Robel.

Q. When did you last meet with Mr. Auchincloss?

A. I met with him on Friday when I was told to go home and come back.

Q. Okay. And did you meet with him before that?

A. Of course. You mentioned an April date that Mr. Auchincloss had me to come up.

Q. Okay. Was that April 7th?

A. I guess, sir. I don't -- I'm not good with dates, so --

Q. You had an interview with Sergeant Steve Robel, right? 5557

A. And Mr. Auchincloss.
Q. Okay. How many meetings did you have with Sergeant Robel, if you know?
A. I only met Sergeant Robel when I was with Mr. Auchincloss. I met them both at the same time.
Q. Okay. So when you said, “I just don’t remember and I would be lying to say that I did,” about head licking, Mr. Auchincloss was right there, right?
A. We were -- we were there, yes, we were -- the three of us were in the room.
Q. So he clearly heard you say that, correct?
A. Mr. Auchincloss was in the room with Mr. Robel.
Q. And he tried to misquote you in court today, correct?
MR. AUCHINCLOSS: Objection. This is argumentative; improper.
THE COURT: Sustained.
MR. MESEREAU: No further questions, Your Honor.

REDIRECT EXAMINATION
BY MR. AUCHINCLOSS:
Q. Mr. Jones, you told Stacy Brown about this head licking incident, true?
A. Apparently I did, sir.
Q. And you have previously stated that the 5558

words on the second paragraph of People's Exhibit 803, which I've shown you - that's the quotes from the book --
A. Uh-huh.
Q. -- the second paragraph - those are your words?
A. Yes.
MR. AUCHINCLOSS: All right. Your Honor, if I may, I'd like to admit --
THE WITNESS: With -- with -- may I see that, sir, again?
Q. BY MR. AUCHINCLOSS: Yes, you may.
A. Because -- it may be with exception. Oh, yes, those are my words.
Q. All right. So you agree that those are your words.
Your Honor, I'd like to admit People's Exhibit 803 into evidence at this time.
MR. MESEREAU: Objection. Hearsay; foundation; relevance.
THE COURT: Let me see the exhibit.
All right. The objection's sustained. It's not going into evidence.
MR. AUCHINCLOSS: All right. May I see that?
Q. But so that we're clear today about your testimony, is it true that you looked at what was going on with the king and the boy, they were 5559

holding each other tightly, almost in a romantic sense --
MR. MESEREAU: Objection. Asked and answered; move to strike.
MR. AUCHINCLOSS: I believe there's been --
THE COURT: Overruled. Go ahead.
Q. BY MR. AUCHINCLOSS: "Holding each other tightly almost in a romantic sense, cooing. There were pecks on the cheeks and licks on the top of the head"; is that true, those are your words?
A. I -- I -- with reservation. I know about the -- as I told you --
Q. I'm asking you are those your words, sir?
A. They apparently are my words. If you have them in an e-mail from me.
Q. Today your testimony is that, "The licking is going to be important," you told Stacy that, "because it happened in this case, too." Those are your words as well?
A. I don't recall saying anything about this case. But if it was in an e-mail, I said it.
Q. You acknowledge that those words -- that this is your e-mail address?
A. B7436@aol --
Q. And this is -- you acknowledged this is one of your e-mails to Stacy Brown?
A. Nobody else could have done it but me.
Q. So do you acknowledge, based upon all the 5560

information that you have today, that you did, in fact, see Michael Jackson lick Jordie Chandler on the top of the head, sir? Yes or no.
MR. MESEREAU: Objection; asked and answered.
THE WITNESS: I guess -- yes.
MR. AUCHINCLOSS: All right.
THE COURT: Just a moment. There was an objection.
MR. AUCHINCLOSS: Sorry.
THE COURT: The objection is overruled. The answer was, “Yes.”
Q. BY MR. AUCHINCLOSS: And your testimony is that this incident happened on a plane flying back from Europe?
A. On flying back from Paris to Los Angeles.
MR. AUCHINCLOSS: Thank you. I have no further questions.

RECROSS-EXAMINATION
BY MR. MESEREAU:
Q. Mr. Jones, on April 7th, you told the police and Mr. Auchincloss you’d be lying if you said you saw Mr. Jackson licking Mr. Chandler, right?
MR. AUCHINCLOSS: Objection. Misstates the evidence and argumentative.
THE COURT: Overruled.
You may answer. Do you want the question 5561

read back?
THE WITNESS: I would say since he -- I have to say it has to be true if it came in my e-mail.
Q. BY MR. MESEREAU: But, sir, you just told the police the other day that you'd be lying if you said he did that, right?
MR. AUCHINCLOSS: Same objections.
THE COURT: Overruled.
Q. BY MR. MESEREAU: Right?
A. I -- I, again, have to say what I said. If it's in my e-mail, it's true.
Q. But you just told the jury you don't recall seeing something like that, correct?
MR. AUCHINCLOSS: Objection. Asked and answered; argumentative.
THE COURT: Overruled.
THE WITNESS: I go back with the same answer. It was in my e-mail. So if it was in my e-mail, I'm taking responsibility for the e-mail.
Q. BY MR. MESEREAU: Well, but you've also indicated a number of the things you wrote are not accurate, true?
A. I didn't write anything. My co-writer wrote those things. But he is -- he has shown me an e-mail that I wrote and sent to my co-writer.
Q. But, sir, you just told the jury what you told the police last week, which is that you'd be lying if you said you saw that, right? 5562

MR. AUCHINCLOSS: I believe that misstates the evidence.
THE COURT: Overruled.
Is that what -- he's really asking you, "Is that what you told the police?" Did you tell the police --
THE WITNESS: Yes, that is what I told the police.
MR. MESEREAU: No further questions.

FURTHER REDIRECT EXAMINATION
BY MR. AUCHINCLOSS:
Q. Mr. Jones, you didn't say, "I would be lying if I said that." You said, "I would be lying if I said I remembered that"; isn't that true?
A. Yes, I did.
Q. And is it fair to say that based on everything you have before you today, you now remember the incidents that you've testified concerning the licking?
A. I don't remember. But there is an e-mail which provides explicit evidence that the e-mail came from me.
Q. And you believe your e-mails are true; you've testified to that?
A. I would not have just made it up.
MR. AUCHINCLOSS: Thank you.
THE WITNESS: Okay. 5563

MR. MESEREAU: No further questions.
THE COURT: All right. Thank you. You may step down.
MR. AUCHINCLOSS: Thank you, Your Honor. Subject to re-call.
THE COURT: All right. I haven't excused him.
MR. AUCHINCLOSS: I'm sorry.
THE COURT: Call your next witness.
MR. AUCHINCLOSS: Call Stacy Brown.
THE COURT: When you get to the witness stand, please remain standing. Face the clerk, over here, and raise your right hand.

STACY BROWN
Having been sworn, testified as follows:

THE WITNESS: Yes.
THE CLERK: Please be seated. State and spell your name for the record.
THE WITNESS: Stacy Brown. S-t-a-c-y; Brown, B-r-o-w-n.
THE CLERK: Thank you.

DIRECT EXAMINATION
BY MR. AUCHINCLOSS:
Q. Good morning, Mr. Brown. 5564

A. Good morning.
Q. What is your occupation, sir?
A. I'm -- currently I'm an analyst for MS-NBC and I'm also an author.
Q. All right. As an author, have you had occasion to collaborate with writers in the creation of books?
A. Oh, yes, several.
Q. Can you give me an example?
A. Well, in 2002, published by Simon & Schuster, I co-authored the book Blind Faith, a biography of Stevie Wonder and his mom, Lula Hardaway.
Q. Have you worked in the past to -- collaborated in the past with any members of the family of Michael Jackson in the creation of books?
A. Yes, I have.
Q. Who would that be?
A. That would be his older sister, Rebbie Jackson, and his brother Jermaine Jackson.
Q. And when I say "Mr. Jackson," is he the man seated to my right with the long black hair?
A. Yes.
Q. Were those -- was there ever any attempt to publish those two books that you just described?
A. The latter two, Rebbie and Jermaine?
Q. Yes.
A. That I -- there was -- 5565

Q. Were they published?
A. No, they was not published.
Q. Do you know why not?
A. Well, the last one with --
MR. MESEREAU: Objection; calls for speculation.
THE COURT: Sustained.
Q. BY MR. AUCHINCLOSS: Were those books, either of them, pulled from the publisher by you?
A. Yes.
Q. Why?
A. At the direction of --
MR. MESEREAU: Objection. Relevance; foundation.
THE COURT: Sustained.
Q. BY MR. AUCHINCLOSS: May I ask foundation or relevance, Your Honor?
THE COURT: The relevance.
MR. AUCHINCLOSS: All right.
Q. Mr. Brown, did you collaborate with Bob Jones or are you collaborating with Bob Jones in the writing of a book concerning his experiences as an employee of Michael Jackson?
A. That’s correct.
Q. How long have you been doing that?
A. Since last summer.
Q. How did you meet Bob Jones?
A. I met Bob years ago. He was, of course, 5566

working for Michael. I was a reporter for the L.A. Daily News at the time, and we were covering a story about Michael's -- the birth of Michael's first child. And I had talked about -- everyone had talked about, everyone in the media, when they want information or comments from Michael on things that -- like having a baby.
Q. Who approached whom concerning the writing of this book?
A. Last January during the arraignment here, Bob Jones approached me -- we were both standing outside that day, and he approached me about writing that book.
Q. And you've worked together to prepare a manuscript?
A. Yeah, we did. And we didn't -- you know, I didn't initially agree to write the book.
Q. Okay.
A. There was some concerns that I had. I didn't want to --
MR. MESEREAU: Objection; nonresponsive.
MR. AUCHINCLOSS: That's fine.
THE COURT: Sustained.
Q. BY MR. AUCHINCLOSS: So did you originally want to write this book?
A. Not originally, no.
Q. Why not?
A. Well, I knew -- 5567

MR. MESEREAU: Objection. Relevance; calls for speculation.
THE COURT: Sustained.
MR. AUCHINCLOSS: It goes to -- offered as credibility.
THE COURT: The objection is sustained.
Q. BY MR. AUCHINCLOSS: Tell me about the collaboration process with Mr. Jones. How has this book come together?
A. Well, I interviewed Bob, another writer also interviewed Bob as well, about his experience, not only with Michael. We have to remember Bob worked with a lot of people including Lionel Ritchie, Rick James, Barry Gordy, the Jacksons as a family.
Q. Uh-huh.
A. So Michael was -- and Bob's mind was seen as just a small part of his story, but obviously the publisher wanted more about Michael because he is Michael.
Q. When you're collaborating with an individual in the preparation of a manuscript, are there -- is there a dialogue with publishers to see what kind of book the publisher will be interested in?
A. Oh, absolutely.
Q. And do you employ a literary agent to try --
A. Yes.
Q. -- and market the book?
A. Yes. And in this particular case, we 5568

1 employed quite a few.
2 Q. Why is that?
3 A. Well, Bob has problems trusting people.
4 MR. MESEREAU: Objection; relevance.
5 MR. AUCHINCLOSS: I can withdraw that.
6 THE COURT: All right. I'll strike his
7 answer. You can rephrase the question.
8 MR. AUCHINCLOSS: That's fine.
9 Q. How many agents did you work with?
10 A. Gosh. It's now -- five now.
11 Q. And you currently -- are you currently
12 employing an agent?
13 A. Yes, we are. We are currently employing
14 two.
15 Q. And what are their names?
16 A. Neil Gudovitz and Bill Gladstone.
17 Q. In working with Mr. Jones, how did you
18 communicate with one another?
19 A. We spoke a lot over the phone. We met in
20 person. And a lot of times, because of the
21 distance, we e-mailed each other.
22 Q. And so how would it work in terms of his
23 working with you?
24 A. What would happen is he would send me an
25 e-mail of a lot of his notes that he had kept over
26 the years. We would talk about them, and then I'd
27 start writing. And I would send him what I write,
28 and he would have to approve it, and then he would 5569

send it back with any type of changes that needed to be made, and the changes would be -- then be made.
MR. AUCHINCLOSS: If I may approach, Your Honor.
THE COURT: Yes.
Q. BY MR. AUCHINCLOSS: Mr. Jones -- or Mr. Brown, I show you People's Exhibit 803. Could you identify those two passages for me?
MR. MESEREAU: Objection to the extent it calls for hearsay.
THE COURT: Overruled. I'll allow him to identify them.
THE WITNESS: By "identify," read them?
Q. BY MR. AUCHINCLOSS: No, just identify them. Are those two passages that came from the book that you're working on with Mr. Jones?
A. That's correct, yes.
Q. And while I'm up here, I'm going to show you People's Exhibit 804. Can you identify that for me?
A. An e-mail Bob Jones sent to me.
Q. You personally received that from Mr. Jones?
A. That's correct.
Q. And an e-mail --
A. That's correct. Another e-mail.
Q. That's Exhibit 805. That's one he sent you as well?
A. That's correct.
Q. Now, for the record, are these complete 5570

e-mails or did they have some material?
A. Oh, they had a lot of material.
Q. But this is just a portion of them?
A. Yeah.
Q. All right. Did Bob Jones, during your collaboration with him in the writing of this book, tell you about an incident in which he observed the defendant, Michael Jackson, lick a boy by the name of Jordie Chandler on the head?
MR. MESEREAU: Objection. Hearsay; and leading.
MR. AUCHINCLOSS: Offered under 1236.
THE COURT: The objection is overruled.
THE WITNESS: I'm sorry.
THE COURT: Just answer that "yes" or "no."
THE WITNESS: Yeah. Yes, he did.
Q. BY MR. AUCHINCLOSS: What did he tell you?
MR. MESEREAU: Objection; hearsay.
THE COURT: Overruled.
You may answer.
THE WITNESS: Well, he described an incident, they were going to the World Music Awards in Monaco, I believe it was. And he talked about how strange it was, because Jordie had a head full of hair, and he said, "I thought maybe it would be more" -- you know, "It would be understandable if he had a bald head." But he just couldn't understand the licking of the head when he had a head full of 5571

hair.
Q. BY MR. AUCHINCLOSS: He said he saw Michael Jackson lick Jordie's head?
A. Correct.
Q. Those two passages that I showed you in Exhibit 803, did you ever share that manuscript that contained those passages with Mr. Jones?
A. Oh, yeah. Absolutely. Bob had to approve everything that went to the publisher.
Q. So everything that went to the publisher was approved by Mr. Jones?
A. That's correct.
Q. And did this -- did those two passages that I just showed you go to the publisher?
A. Oh, yeah.
Q. Did you discuss this issue of the licking incident on more than one occasion?
A. Oh, yes, we did. Do you want me to --
Q. Go ahead.
A. Yeah, we did. Beginning in, I would say, maybe August or September, he and I discussed it. And we discussed it with another writer, Dennis love, and also our agent and the publisher.
Q. Okay. You previously mentioned Neil Gudovitz and Bill Gladstone. Was it discussed with those two gentlemen?
A. Yes.
Q. And your publisher, who would that be? 5572

A. That would be Select Books.
Q. Okay. Specifically who was this issue discussed with?
A. Well, it was discussed not only with -- well, specifically at Select Books?
Q. Yes. And I mean by Mr. Jones himself.
A. We had -- well, I don't know that Bob discussed it with Select. But we discussed it with Simon & Schuster and Harper Collins in a conference call that we had. Bob discussed it with them. They discussed the entire -- the entire proposal that we put before them, and that included that.
Q. All right. This e-mail that I showed you, 804 - I'll show it to you again just so you're familiar with what I'm talking about - references that, "The licking is going to be important because he did it in this case, too."
Can you tell me, what was the context of that remark?
MR. MESEREAU: Objection. Relevance; foundation; and calls for hearsay.
THE COURT: Sustained.
Q. BY MR. AUCHINCLOSS: What did you understand he was referring to when he said, "this case, too"?
MR. MESEREAU: Objection. Foundation; relevance.
THE COURT: Overruled.
Excuse me. Sustained. 5573

Q. BY MR. AUCHINCLOSS: Did you stay abreast of the information in the media during the writing of this book?
A. Yeah, I had to. It's my job.
Q. Okay. Did you -- did you check the Internet sources of news media?
A. Yeah. I look at different newspapers and news outlets throughout the country, and their take on what's going on as well.
Q. And on October 30th, 2004, had you ever heard of any kind of licking that had gone on in the case of People v. Michael Jackson that's presently before the Court?
MR. MESEREAU: Objection. Relevance; foundation; hearsay.
MR. AUCHINCLOSS: In the media outlets.
MR. MESEREAU: Improper hearsay.
THE COURT: I guess I'm not sure where you're going with what his knowledge is of this case, how that relates to what Mr. Jones has said.
MR. AUCHINCLOSS: Whether it had been reported in the media from another source - he says he kept abreast of all the media sources - or whether this was the first time he'd heard it.
THE COURT: All right. If you'll rephrase the question to relate to the relevance that you're describing.
MR. AUCHINCLOSS: Okay. 5574

Q. My question is this, Mr. Brown: When Mr. Jones wrote you this e-mail on October 30th, were you aware at that time that there was an allegation of licking in the case involving Gavin Arvizo and Mr. Jackson?
A. I can't say that --
MR. MESEREAU: Objection; foundation.
THE COURT: The objection is overruled.
Q. BY MR. AUCHINCLOSS: All right. Go ahead.
A. I can't say that I was, because I -- when Bob told me, it was the first that I'd heard of the incident. He had actually heard it first as it pertains to this case, and that's when -- that prompted him to share with me that it was going to be important.
Q. Now, he says in that e-mail, "The licking is going to be important because he did it in this case, too." Was that the first time you heard of the connection between the two --
A. Yes.
Q. -- cases?
Had he talked to you about the licking before that?
A. We had started discussing --
MR. MESEREAU: Objection. Relevance; foundation; hearsay.
THE COURT: I'll overrule the objection. But the question is simply whether or not he 5575

discussed this with you before that e-mail.
Q. BY MR. AUCHINCLOSS: So that's a "yes" or "no."
A. That particular e-mail?
Q. Yeah, before that e-mail.
A. The e-mail, no. The incident, yeah.
Q. Okay, the incident. He discussed it before that e-mail?
A. Yeah.
Q. Has Mr. Jones ever indicated to you a fear of testifying in this case?
MR. MESEREAU: Objection. Foundation; relevance; calls for speculation; move to strike.
THE COURT: Sustained. The objection is sustained. Stricken.
Q. BY MR. AUCHINCLOSS: Was there a period of time when Mr. Jones all of a sudden began to have a loss of recollection or something of that nature regarding this licking incident?
MR. MESEREAU: Objection. Leading; calls for speculation.
THE COURT: I'll sustain the objection as the question is too broad.
Q. BY MR. AUCHINCLOSS: Okay. At some time during your collaboration with Mr. Jones, did he ever try to deny his recollections about this licking incident?
MR. MESEREAU: Objection. Leading; calls

for speculation; relevance; foundation.
THE COURT: I'll overrule the objection. The
question should be read back to the witness.
(Record read.)
THE WITNESS: Yeah. He had fuzzy
recollections about it, yes.
Q. BY MR. AUCHINCLOSS: Was there --
THE COURT: Just a moment. We're going to
take our break.
(Recess taken.)
--o0o--

REPORTER'S CERTIFICATE

THE PEOPLE OF THE STATE)
OF CALIFORNIA,)
Plaintiff,)
-vs-) No. 1133603
MICHAEL JOE JACKSON,)
Defendant.)

I, MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304, Official Court Reporter, do hereby certify:

That the foregoing pages 5521 through 5577 contain a true and correct transcript of the proceedings had in the within and above-entitled matter as by me taken down in shorthand writing at said proceedings on April 11, 2005, and thereafter reduced to typewriting by computer-aided transcription under my direction.

DATED: Santa Maria, California, April 11, 2005.

MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SANTA BARBARA
SANTA MARIA BRANCH; COOK STREET DIVISION
DEPARTMENT SM-2 HON. RODNEY S. MELVILLE, JUDGE

THE PEOPLE OF THE STATE OF)
CALIFORNIA,)
Plaintiff,)
-vs-) No. 1133603
MICHAEL JOE JACKSON,)
Defendant.)

REPORTER'S TRANSCRIPT OF PROCEEDINGS

MONDAY, APRIL 11, 2005

8:30 A.M.

(PAGES 5579 THROUGH 5770)

REPORTED MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304
BY: Official Court Reporter 5579

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I N D E X

Note: Mr. Sneddon is listed as “SN” on index.
Mr. Zonen is listed as “Z” on index. Mr. Auchincloss is listed as “A” on index.
Mr. Mesereau is listed as “M” on index. Ms. Yu is listed as “Y” on index.
Mr. Sanger is listed as “SA” on index. Mr. Oxman is listed as “O” on index.

PLAINTIFF’S WITNESSES DIRECT CROSS REDIRECT RECROSS
BROWN, Stacy 5583-M 5593-A 5595-M
CHANDLER, June 5596-SN 5658-M 5727-SN 5734-M
SWINGLER, Dwayne 5736-A 5754-M 5765-A

THE COURT: All right. Go ahead.
MR. AUCHINCLOSS: Thank you, Your Honor.
Q. Mr. Brown, where we left off, I was asking you about this period of time when Mr. Jones started to have some failure of recollection on the issue of head licking.
When did that -- do you recall when that began or when that started?
A. It's been about a month or so now.
Q. Before that time, how many times had you been involved in a conversation where Mr. Jones talked about the head-licking incident?
MR. MESEREAU: Objection; relevance.
THE COURT: Overruled.
THE WITNESS: I can't tell you exact number of times, but it was more than a couple.
Q. BY MR. AUCHINCLOSS: Okay. And how would you describe this change in his recollection, if you can?
MR. MESEREAU: Objection; vague.
MR. AUCHINCLOSS: I can be more specific.
MR. MESEREAU: Relevance.
Q. BY MR. AUCHINCLOSS: My question goes to, was it an abrupt change, or was it something that occurred over a period of time, or something in between?
MR. MESEREAU: Objection. Vague; relevance; foundation. 5582

THE COURT: Overruled.
You may answer.
THE WITNESS: I would say it was more abrupt
than anything else.
MR. AUCHINCLOSS: Thank you, Mr. Brown. I
have no further questions.
THE COURT: Cross-examine?
MR. MESEREAU: Yes, please, Your Honor.

CROSS-EXAMINATION
BY MR. MESEREAU:
Q. Good morning, Mr. Brown.
A. Good morning.
Q. How long have you known Bob Jones?
A. The year Princess Diana died. I think it
was '97.
Q. Okay. And approximately when did he tell
you he intended to write a book?
A. It was about January, a few months before he
was terminated.
Q. And you've been interviewed by the sheriffs
in this case, right?
A. That's correct.
Q. And you told the sheriffs that Bob Jones
told you he's broke and he needs to make some money,
right?
A. That's what --
MR. AUCHINCLOSS: Objection; hearsay. 5583

THE COURT: Sustained.
Q. BY MR. MESEREAU: Have you gone through different drafts with Mr. Jones?
A. Yes, I have.
Q. On the issue of head licking, did Mr. Jones tell you at one point he had to make money on this book because he had financial problems?
MR. AUCHINCLOSS: Objection. Hearsay; argumentative.
THE COURT: Overruled.
You may answer.
THE WITNESS: He didn't -- Mr. Mesereau, he didn't tell me that in relation to the head licking. That never came up in discussions of money.
Q. BY MR. MESEREAU: But he told you he's broke and has to get paid for this book, correct?
MR. AUCHINCLOSS: Objection. Hearsay; argumentative.
THE COURT: Overruled.
You may answer.
THE WITNESS: When we first started the book, he said he needs the money. He was just fired.
Q. BY MR. MESEREAU: And he said he was broke, right?
A. Yes. That's correct.
Q. You told the police you said he was broke, right?
A. That's correct. 5584

Q. Okay. Now, how did -- how did the -- let me rephrase that.
Obviously at some point you met with Bob Jones about writing a book, correct?
A. That's correct.
Q. And where did you meet with him?
A. Well, as I said earlier, he first approached me here at the court, back during the arraignment.
Q. And did he tell you then he wanted to write something?
A. That's correct.
Q. And that's before he --
A. That's before his termination.
Q. Okay. And how long before his termination was that, do you think?
A. Well, it was January, so -- the termination was in June. So four, five months.
Q. And did he tell you he was doing it secretly?
A. Well, he didn't say secretly, but he said -- obviously any process with a book, you don't want everyone to know this is what you are doing. I did, however, myself, tell members of the family, to get their thoughts on it, because that was my concern, what their thoughts may be with me doing a book with Bob Jones with -- chiefly it had to be about Michael Jackson.
Q. Okay. Now, did Mr. Jones tell you he was 5585

talking to anyone from the sheriff's department?
A. Not at that time, no.
Q. When did you first learn that he had spoken to anyone from the sheriff's department?
A. I believe they first contacted him in December of last year.
Q. And based on the prosecutor's questions to you, you must have learned at some point that Bob Jones was saying he couldn't really remember seeing any head licking, right?
MR. AUCHINCLOSS: Objection; hearsay.
THE COURT: I'm sorry, I can't read the --
THE REPORTER: "Learned" instead of "render."
THE COURT: All right. The objection is Overruled.
You may answer.
THE WITNESS: Could you repeat it, sir?
MR. MESEREAU: I'll have it read back. May it be read back, Your Honor?
THE COURT: Yes.
(Record read.)
THE WITNESS: Oh, I wouldn't say it was based on the prosecutor's -- that. I think it was simply when I spoke with him, he got a little nervous about that particular vein. I think he realized that it was going to become a part of this
-- 5586

Q. BY MR. MESEREAU: Well, did you and Mr. Jones discuss the fact that the Arvizos went to Larry Feldman, the same lawyer who represented the Chandlers?
A. The --
MR. AUCHINCLOSS: Objection. Relevance; beyond the scope; and argumentative.
THE COURT: Sustained.
Q. BY MR. MESEREAU: Has the name Larry Feldman come up in the book you're writing?
MR. AUCHINCLOSS: Same objection.
THE COURT: Overruled.
You may answer.
THE WITNESS: Not by name, but certainly by title and by inference. Bob did say, based on his notes back in --
Q. BY MR. MESEREAU: Well, just -- you just have to answer the question, okay? I'll get into that --
A. Okay.
Q. -- okay?
Does the book concern this case in any respect?
A. I would think in some respects.
Q. And is it your plan to market the book while this trial is going on?
A. Well, it all depends on when it's finished.
Q. Has he ever talked to you about when he 5587

plans to complete the book?
A. Well, I have a lot of say in that, so we've talked about that, and we've always said we don't want it to be a rush job, and a lot of people want it to be a rush job. The publisher wants it to be a rush job.
Q. The publisher wants it to be a rough job --
A. Rush job.
Q. -- rush job because you can sell it better while the trial is going on, right?
A. Obviously, if it comes out now, it would probably pique some interest because it's Bob Jones, who, you know, has worked for Michael for so long, and it's Michael.
Q. Now, have you discussed the amount of money he might make on the book?
A. No, you know, we -- we've been made promises in the past. We don't listen to that. We don't even speculate on what can be made.
Personally, I just enjoy writing, so, you know, the money aspect -- I think I do pretty well. It's not a big deal to me.
Q. Do you remember you were interviewed by a Santa Barbara sheriff on December 7th, 2004?
A. Around about, yeah.
Q. And you were approached by Sergeant Robel, right?
A. Uh-huh. Yes, that's correct. I'm sorry. 5588

Q. And the purpose of the interview was to talk to you about this alleged head-licking event, right?
A. I'm not sure if that was the purpose of the interview. We talked about various things back in December, but I'm not sure that was the purpose of it.
Q. And do you remember Sergeant Robel wanted to know why you had said that Mr. Jones told you he saw Michael Jackson kiss Jordie, not lick his head?
A. Well, that's not exactly what -- that I remember Sergeant Robel putting to me. There was a question another investigator had had about whether I said he -- Bob said he licked or kissed him, and he wanted me to clarify that.
Q. And you had told the investigator that based on your discussions with Bob Jones, he had said that Michael Jackson kissed Jordie one time, didn't lick his head, right?
A. No, I didn't say that.
Q. Do you remember you apologized?
A. No, no. What happened -- I apologized if it was confused. But what happened was, I think the investigator had misunderstood and that's what he was calling to clarify. That's one of the reasons why he called, to clarify exactly what I said. He said he didn't remember if I said "licking" or "kissing."
Q. Let me ask you if this is correct. 5589

A. Sure.
Q. “Brown apologized for the mistake. Said he had not realized that he told me he was kissing as opposed to licking.” Does that sound accurate to you?
A. It’s probably accurate. But again, as I’m explaining to you, I explained to Sergeant Robel when he asked the question, when he asked me about that, I had told the other investigator, I think it was Zelis, I’m -- I’m not sure, but I think it was Paul Zelis, the investigator’s name, and I think he was the one who had actually made the mistake or -- I won’t even say “mistake.” He wanted to clarify, is that what I said.
Q. Why did you apologize to him?
A. Well, I apologized for being polite. I mean, it’s just a polite thing to do, you know. If I was wrong, I have no problems apologizing.
Q. Now, you’re aware that Mr. Jones has indicated he doesn’t remember head licking and has said he’d be lying to say that he did. Are you aware of that?
MR. AUCHINCLOSS: Objection; misstates the evidence.
THE COURT: Sustained.
Q. BY MR. MESEREAU: You’re in the process of writing the section of the book that deals with this trip to Monaco, aren’t you? 5590

A. No. No, we're long since past that.
Q. Well, Mr. Jones has indicated that he has not approved --
A. Everything that has --
MR. AUCHINCLOSS: Objection. Argumentative; hearsay as to what Mr. Jones said; and misstates the evidence.
THE COURT: It's an incomplete question, too.
Q. BY MR. MESEREAU: Mr. Jones has final approval over what's in that book, doesn't he?
A. Absolutely.
Q. Would you agree that the more sensational the book, the better the chance of making money on it?
A. Well, obviously. I mean, we've been told things that nothing surprises them about Michael Jackson, so -- but it's not our intentions to write a book of scandal, if that's what you're inferring. It's certainly not mine, and I have to write it. And I have people in his family who I happen to love very much who I'm not going to disappoint.
Q. They're not getting any money from the book, are they?
A. The family?
Q. Yes.
A. Why should they?
Q. They're not getting any money from the book, are they? 5591

A. I'm sorry to respond in that way. No.
Q. The one who is going to make money is Bob Jones, who's broke, right?
A. We both will.
Q. You're aware that Bob Jones was very upset when he was terminated, aren't you?
A. You know what? To be honest with you, he wasn't upset that he was terminated. He was upset in which the way Randy terminated him.
Q. I'm not sure what that means.
A. Well, Bob had --
Q. Referring to Randy Jackson, right?
A. Randy Jackson, I'm sorry.
Bob had felt he'd been loyal to Michael for basically half of Michael's life, or most of Michael's life, I should say. And to get fired by a messenger, you know, I felt bad, too. In fact, I had spoke to someone in Michael's family about that. I said, "That's horrible."
But he was just upset in the method. He knew that eventually his time was going to be up just like everyone else's.
Q. In the draft that you and Mr. Jones have written, Mr. Jones says on at least two occasions that he's never seen Michael Jackson act inappropriately with children, right?
MR. AUCHINCLOSS: Objection; hearsay.
THE COURT: Overruled. 5592

You may answer.
THE WITNESS: Well, if it was the exact --
well, I don't remember the exact wording, but to say
that he saw him molest anybody, no, it does not say
he saw him molest anybody.
MR. MESEREAU: I have no further questions,
Your Honor.

REDIRECT EXAMINATION
BY MR. AUCHINCLOSS:
Q. Mr. Jones (sic), I previously showed you
People's Exhibit 803. Did Mr. Jones approve those
two passages?
A. Yes.
MR. AUCHINCLOSS: Ask to move 803 into
evidence.
MR. MESEREAU: Objection. Hearsay;
foundation.
THE COURT: Sustained.
MR. MESEREAU: Relevance.
MR. AUCHINCLOSS: Offered as a prior
inconsistent statement as to the first passage and a
prior consistent statement as to the second.
MR. MESEREAU: Same objection.
THE COURT: The ruling remains the same.
MR. AUCHINCLOSS: All right. Ask at this
time to admit the two e-mails, Your Honor, Exhibits
804 and 805, into evidence at this time. 5593

MR. MESEREAU: Objection. Hearsay;
foundation; authenticity; relevance.
THE COURT: I'll take that up later.
MR. AUCHINCLOSS: Okay.
Q. Mr. Brown, you said that Mr. Jones was
complaining about his finances on cross-examination.
A. Uh-huh. Yes.
Q. Is this a frequent complaint?
A. Yeah, he's -- well, yeah, he's made a few
complaints about that.
Q. Was there a time when he stopped complaining
about his finances during this period of
collaboration?
A. Yes.
Q. Was what -- when -- when he stopped
complaining about finances, tell me, was there any
relationship in time to that point and the time in
which he started to have this failure of
recollection?
MR. MESEREAU: Objection. Relevance; vague;
foundation.
THE COURT: I'll sustain vague.
Q. BY MR. AUCHINCLOSS: Can you tell me
approximately when in time Mr. Jones stopped
complaining about his finances?
A. It's been about a month or so.
Q. And when in time did he start to have his
failure of recollection? 5594

A. About a month or so.
Q. Did they -- did both of those coincide in time?
A. I would say so, yes.
MR. AUCHINCLOSS: Thank you. I have no further questions.

RECROSS-EXAMINATION
BY MR. MESEREAU:
Q. Mr. Brown, what I think the prosecutor just elicited is the following: When he was broke, he said there was licking. And when he didn't have financial problems, he said there wasn't any, right?
A. Well, if that's how you --
Q. Right?
A. -- break it down, yeah, I guess.
MR. MESEREAU: Thank you.
MR. AUCHINCLOSS: No further questions.
THE COURT: Thank you. You may step down. Would you give me Exhibits 804 and 805? Call your next witness.
MR. SNEDDON: June Chandler, Your Honor.
THE BAILIFF: She's on her way, Your Honor.
THE COURT: 804 and 805 are not admitted. Come forward, please. When you get to the witness stand here, remain standing. Face the clerk here and raise your right hand. 5595

JUNE CHANDLER
Having been sworn, testified as follows:

THE WITNESS: I do.
THE CLERK: Please be seated. State and spell your name for the record.
THE WITNESS: June Chandler. J-u-n-e; C-h-a-n-d-l-e-r.
THE CLERK: Thank you.
THE WITNESS: You're welcome.

DIRECT EXAMINATION
BY MR. SNEDDON:
Q. Good morning, Mrs. Chandler.
A. Good morning.
Q. I want to go back in time a little bit to around 1992 and '93, okay?
A. Yes.
Q. And are you related in some fashion to Jordan Chandler?
A. Yes. He is my son.
Q. Okay. And we're going -- you know, I should have done this before we started.
A. Yes.
Q. You have to lean right into that microphone so everybody can hear what you have to say. We've had the same problem with everybody, so it's not just you. 5596

A. Okay.
Q. You have a very soft voice, so you keep it up, all right?
A. Okay. I will.
Q. Let me start all over again and ask you again. Are you related to Jordan Chandler?
A. Yes, I am. He is my son.
Q. Do you have any other sons or daughters?
A. Yes, I have a daughter.
Q. And her name?
A. Lily Chandler.
Q. And how old is Lily right now?
A. 17 years old.
Q. Now, in 1992 and 1993, were you married?
A. Yes, I was.
Q. And to whom were you married?
A. To David Schwartz.
Q. And is David Schwartz the father of either of your children?
A. Yes.
Q. Which one?
A. Lily Chandler.
Q. And prior to your marriage with David Schwartz, you were married to Evan Chandler, correct?
A. Correct.
Q. And Evan Chandler is the father of Jordan Chandler? 5597

A. Correct.
Q. What is Jordan's date of birth?
A. January 11th, 1980.
Q. And to your knowledge, had -- by the time of the events in 1992 and '93, had Evan Chandler remarried?
A. Yes.
Q. And do you know his wife or did you know his wife at that time?
A. Yes, I did.
Q. And her name is?
A. Natalie Chandler.
Q. And did they have any other children?
A. Yes, they did.
Q. And the child's name?
A. Nicky Chandler. And Emmanuelle Chandler.
Q. And at the time of 1992 and 1993, can you give us the approximate ages of those children?
A. As best as I can recall, seven and four.
Q. And who is the oldest?
A. Nicky Chandler, the son.
Q. Okay. Now, I want to show you some photographs. The first photograph we have that's marked is 793, the next one is 794, and the next one is 795, okay?
The first one, 793, I'll ask you if you recognize the person depicted in that photograph?
A. No, I do not. 5598

Q. Have you ever seen that person before?
A. Not that I recall.
Q. And I want to show you a photograph marked as 794, or Exhibit 794. Do you recognize the people depicted in that photograph?
A. Not that I recall.
Q. Neither the top nor the bottom?
A. He might look familiar.
Q. Okay. And the bottom photograph?
A. I don't recall.
Q. And with regard to Exhibit No. 795, do you recognize any of the people depicted in that photograph?
A. I recall this boy and Michael Jackson.
Q. All right. "This boy" meaning the person on the far left-hand side of the Exhibit 795?
A. Correct.
Q. And do you recall the boy's name?
A. Brett Barnes.
Q. Do you recall where you saw Mr. Barnes, or the child Barnes?
A. At Neverland.
Q. Okay. So with regard to the Photographs 793, 794 and 795, none of those photographs are pictures of your son, correct?
A. No. No.
Q. I want to show you 776; ask you if you recognize that photograph? 5599

A. Yes, I do.
Q. And who is that?
A. That's my son.
Q. Your son?
A. Jordan.
Q. All right. Thank you.
Your Honor, with the Court's permission, I'd like to publish these just so the jury knows what the witness has testified to.
THE COURT: Yes.
MR. SNEDDON: And we're going to do it on the Elmo, Your Honor. So if we could have that.
All right, Gordon?
Q. All right. The photograph that's on the board that's 793 is an exhibit of the child with the long black hair. And that is not your son, Jordan Chandler?
A. No, it's not.
Q. All right. And the next exhibit would be 794. And specifically I'm going to direct your attention to the child sitting on the floor with the arrow drawn up to him. Do you recognize that child?
A. Barely.
Q. Who do you think that -- when you say "barely," who do you recognize --
A. I would say it's probably a younger photo of the boy above.
Q. And do you recognize who the boy above in 5600

that photograph is?
A. I think that's Brett Barnes.
Q. Okay. And the last photo is 795. And you indicated the child on the far left-hand side of the photograph; is that correct?
A. Correct.
Q. The child with the hat next to Mr. Jackson?
A. Correct. That's Brett Barnes.
Q. That's Brett Barnes. All right. Thank you.
And lastly, the photograph marked as 776, you've identified that as your child, Jordan, correct?
A. My son Jordan.
Q. Your son Jordan?
A. Yes.
Q. All right. Thank you.
We can have the lights again, Your Honor.
Now, Mrs. Chandler, do you recognize the defendant in this case, Michael Jackson?
A. I do.
Q. And have you been in Mr. Jackson's presence before?
A. Yes.
Q. Now, your son Jordan, did you have -- let me go back in time. Did you have an occasion where you actually met Michael Jackson?
A. Yes, I had an occasion.
Q. For the first time? 5601

A. Yes.
Q. Would you tell the ladies and gentlemen of the jury, where did that occur?
A. That occurred at my ex-husband's employment, Rent-A-Wreck.
Q. And where is that located?
A. In West L.A.
Q. And was -- do you remember about approximately when that occurred?
A. It was in the summer of '92. Late summer.
Q. And were you actually at the -- your husband's place of business when Mr. Jackson showed up?
A. After he showed up, yes.
Q. Okay. You received a telephone call from someone?
A. Yes, from my ex-husband.
Q. And by the way, your ex-husband's name is what?
A. David Schwartz.
Q. Did you ever take Mr. Schwartz's last name?
A. No, I did not.
Q. So you've always been June Chandler?
A. I've always been June Chandler.
Q. So you received a telephone call and then you went down to his place of business?
A. Yes, I did.
Q. With regard to your son Jordan, did Jordan 5602

go with you?
A. Yes, he did.
Q. Was Mr. Jackson there?
A. Yes, he was.
Q. And do you recall how long you were with Mr. Jackson and Jordan that day?
A. Briefly. Five minutes. Ten minutes.
Q. And did -- was there any information exchanged between you and Mr. Jackson that day?
A. Yes.
Q. And what was that?
A. I said, “If you would like to see Jordie or if he could call you or if you’d like to speak to him, here is our number, and you can give him a call.”
Q. And you gave that to Mr. Jackson?
A. Yes, I did.
Q. Now, let me go back in time. Before this meeting that you had at your husband’s place of business in 1992, had Jordan ever expressed, to your knowledge, some admiration for Mr. Jackson?
A. Oh, very much so, yes.
Q. How did he display that admiration?
MR. MESEREAU: Objection; hearsay.
MR. SNEDDON: I didn’t ask for a statement, Your Honor. I asked for a display.
THE COURT: All right.
He’s not asking for anything that was said. 5603

Do you understand the question?
THE WITNESS: Would you repeat the question, please?
Q. BY MR. SNEDDON: Yes.
How did your son Jordan, prior to this meeting that occurred at David Schwartz's place of business, express -- display his admiration for Mr. Jackson?
A. He had a little sparkly jacket that he would wear to parties. He would have a glove like Michael Jackson, and dance around like Michael Jackson.
Q. And this was all before he met Mr. Jackson?
A. Before he met Michael Jackson, yes.
Q. Now, after the incident occurred where there was an exchange where you gave Mr. Jackson your telephone number -- and let me go back and ask you a question about that. Was the telephone number you gave him your home number?
A. Yes, it was.
Q. Did -- to your knowledge, did Mr. Jackson ever call your son Jordan?
A. Yes, he did.
Q. And do you recall, for the ladies and gentlemen of the jury, approximately what the time span was from the incident that occurred at your ex-husband's place of business to the time that Mr. Jackson actually called your son?
A. To the best of my recollection, it could 5604

have been a month or two after our first meeting with Michael Jackson at Rent-A-Wreck.
Q. Were you actually in the room when Mr. Jackson called?
A. I don't recall being in the room, but I might have been.
Q. Do you recall at some time visiting Neverland Ranch?
A. Yes, I do.
Q. Do you recall approximately when that occurred?
A. I recall around February.
Q. Of?
A. 1993.
Q. 1993?
A. Yes.
Q. So what I want to ask you is, between the time that Mr. Jackson started calling your son to the time that you went to Neverland Ranch, can you give the jury some idea of the number of times Mr. Jackson called your son Jordan?
A. To the best of my recollection --
MR. MESEREAU: Objection; foundation.
THE COURT: Sustained.
Q. BY MR. SNEDDON: Were you present in the house when these conversations occurred?
A. Yes, I was.
Q. Did you sometimes answer the phone? 5605

A. Yes.
Q. And Mr. Jackson was on the line?
A. Yes, he was.
Q. And were you also present in the house during the time to observe the length of the conversations between your son and Mr. Jackson?
A. Yes, I was.
Q. On more than one occasion?
A. Absolutely.
Q. All right. So based upon your observations and the things that you saw and the things that you heard, give us an estimate of the number of times, that you know of, that Mr. Jackson called your son Jordan.
A. I would say eight to ten times.
Q. And with regard to those conversations in which you have personal knowledge of the length of time, could you give the jury some idea of how long these conversations lasted?
A. It was from maybe ten minutes, to an hour, or an hour and a half. It progressed. It got longer and longer.
Q. Could you describe to the jury what your son's reaction was to these phone calls?
A. He was excited to hear from him. They were talking about things that interested Jordie, so, um --
Q. In those occasions where you picked up the 5606

phone and you talked to Mr. Jackson, did he tell you where he was?
A. No, he didn't tell me. No.
Q. Now, how is it that you and Jordan ended up going to Neverland Valley Ranch for the first time?
A. We were invited to go to Neverland, because during those conversations, Michael Jackson said, "Would you like to come to visit? When I am finished touring," he was doing a European tour, I think, he said we can come and visit. And my son was very excited to be able to go up there and see Neverland.
Q. Now, the first time you went to Neverland, you told the jury it was sometime in February of 1993. How did you get there?
A. I drove.
Q. And who went with you besides Jordan, if anyone?
A. My daughter Lily.
Q. And at this point in time, how old was Lily?
A. Was seven, I think. Seven or eight.
Q. And Jordan was born in 1980, so he was 13 years old at the time you made the first visit, correct?
A. 12, 13, yes. Yes.
Q. And do you recall whether it was during the week or on a weekend that you visited?
A. On a weekend. 5607

Q. During the time that you were -- during this first visit, do you recall how many days you were there?
A. Oh, two nights.
Q. Okay. So two nights and at least two days and possibly a third day?
A. Two nights. There was not a third day.
Q. And where did you stay while you were at the ranch?
A. Guest cottage.
Q. Where did you personally stay?
A. The guest cottages at Neverland.
Q. And was there somebody in your cottage with you?
A. Yes, my daughter and my son.
Q. So Jordan stayed with you and Lily in the same cottage?
A. Yes.
Q. And was this during the entire length of this first visit?
A. Yes.
Q. And while you were at the ranch during the first visit, did you see Mr. Jackson?
A. Yes, we did.
Q. And did you spend time with Mr. Jackson?
A. Yes, I did.
Q. Did you spend a lot of time with Mr. Jackson? 5608

A. Yes.
Q. And when you say, “Yes, I did,” can you tell us about what Jordan and Lily did?
A. We were all either taking rides on the Ferris wheel, playing video games. Jordie and Michael were playing video games. I was watching. Lily was playing. We looked at his animals that he had. Just different things that were at Neverland.
Q. Okay. And I think you’ve described that as being an amazing weekend?
A. Yes. Fun.
Q. Now, during the time that you were there on this first visit, do you recall whether or not you went with Mr. Jackson to a business called Toys-R-Us?
A. Yes.
Q. And could you tell us about that?
A. I guess it was after hours, after Toys-R-Us closed, and Michael said, “Jordie and Lily, you get to go shopping and buy toys, get toys.” So we went and --
Q. When you say “we went,” who’s “we”?
A. Lily and Jordie and Michael and I went. And they had fun. They were shopping and Michael bought lots of things for them. They picked out stuff, and they were showered with great presents from Toys-R-Us.
Q. And Mr. Jackson paid for all of that? 5609

A. I -- yes, he did.
Q. You didn't, right?
A. No.
Q. Now, after you left Neverland Valley Ranch after this first visit, did you ever go back to Neverland Valley Ranch?
A. Yes.
Q. And do you recall how much time elapsed between the first time you went there and the second time you went back?
A. It could be a week later or two weeks after.
Q. And when you went back the second time, do you recall how you got there?
A. I -- to the best of my recollection, I was picked up by Michael Jackson.
Q. When you say "picked up by Michael Jackson," in what form of transportation was that?
A. In his car, limo.
Q. And who else was with you when you got picked up? I mean, from your family. Let's start that way first.
A. It was Lily, my daughter, and Jordan.
Q. So the three of you?
A. My son.
Q. The three of you went back to the ranch?
A. Right.
Q. Was there anybody else in the limo that you recall with Mr. Jackson? 5610

A. Well --
Q. Let me go back and make something clear.
A. Sure.
Q. Was Mr. Jackson actually in the limo himself?
A. Yes, he was.
Q. Now, let's ask the question --
A. Okay.
Q. -- was there anybody else in the limo other than Mr. Jackson and the three of you?
A. Yes, there was Brett Barnes.
Q. And do you recall where Mr. -- where the child Brett -- let me ask you this: With regard to Brett Barnes, can you estimate about approximately what age you felt Brett Barnes was at this point?
A. 11. 10, 11.
Q. So he was a child?
A. He was a child.
Q. And where was Brett Barnes in the car in relationship to Mr. Jackson?
A. Sitting next to Michael Jackson.
Q. Now, on the second visit you went to the ranch, do you recall how long you stayed?
A. A weekend.
Q. And did you spend time -- did you personally spend time with Mr. Jackson that weekend?
A. Yes, I did.
Q. Did Jordan spend time with him that weekend? 5611

A. Yes, he did.
Q. And did you see Brett Barnes around there that weekend?
A. Yes. I don't really remember, but yes, he was there, too. Yes, he was enjoying that time also.
Q. And where did you personally sleep during your stay, the second visit to Neverland Valley Ranch?
A. Guest cottages.
Q. Where did Lily stay?
A. In the guest cottages.
Q. And where did your son Jordan stay?
A. In the guest cottages.
Q. Now, the guest cottages are all located in one general area, correct?
A. Yes.
Q. They're all sort of connected into one building?
A. Correct.
Q. With regard to that building, did you ever see Brett Barnes anywhere around the building and the cottages?
A. Not that I recall.
Q. Now, how did you get home from Neverland on this second visit?
A. We were driven home.
Q. In a limo? 5612

A. Yes.
Q. Was Mr. Jackson present?
A. I don't recall.
Q. Was there ever an occasion where you went to Disneyland?
A. Yes.
Q. And do you recall when that happened in relationship to like either one of these first, second visits?
A. That could have been that weekend, the second weekend that we were at Neverland that we went -- instead of going to Los Angeles, we went to Anaheim, to Disneyland. It could have been that weekend.
Q. And who all went to Disneyland?
A. I remember Jordan, Lily, Michael and I, and perhaps Brett.
Q. Now, did you ever have an occasion to visit Neverland Valley Ranch again?
A. Yes.
Q. And do you remember approximately how much time elapsed between the second visit and the third visit?
A. It could have been a week. A weekend.
Q. And when you went to the ranch on this third occasion, was Mr. Jackson present?
A. Yes, he was.
Q. And where did you sleep? 5613

A. In the guest cottages.
Q. And where did Lily sleep?
A. In the guest cottages.
Q. And where did Jordan sleep?
A. In the guest cottages.
Q. At some point in time during any one of these three visits to -- these three visits you've described to the jury, did your son request to sleep in Mr. Jackson's bedroom?
A. Yes --
MR. MESEREAU: Objection; leading.
THE WITNESS: -- he did.
THE COURT: Overruled. Next question.
Q. BY MR. SNEDDON: And do you recall during which one of the visits it was that the request came?
A. Oh, the third visit.
Q. And did you allow him to do that?
A. No, I did not.
Q. Did you notice -- I may not have asked this with regard to the third visit, but you indicated in at least the first visit that Jordan slept with you in your guest cottage, correct?
A. Correct.
Q. In the second visit, did Jordan sleep with you in your guest cottage?
A. Yes, he did.
Q. And the third visit, did Jordan sleep with 5614

you in your guest cottage?
A. Yes, he did.
Q. Did you notice anything with regard to what time of the day or night it was that Jordan finally came to your cottage to go to bed?
A. I assume it was late, after eleven o'clock.
Q. Why do you assume that?
A. Because they were playing all day and all night. And it was a weekend. He did not have school, so he was allowed to stay up later than 11:00.
Q. During any of your visits to Neverland Valley Ranch, did you ever meet any children from New Jersey?
A. Yes.
Q. Do you remember their names?
A. Frankie and Eddie.
Q. And with regard to Frankie at this point in time, do you recall approximately how old Frankie was?
A. Around the same age as Jordan, or maybe younger.
Q. And how about Eddie?
A. I don't recall. I don't know which one is which.
Q. Do you recall their last name at all?
A. Cascio.
Q. And do you remember which one of the visits 5615

to the ranch was it that you met Frank Cascio?
A. No, I don't.
Q. Was there -- was there some point in time when you took a trip with Mr. Jackson to Las Vegas?
A. Yes, there was.
Q. And do you remember when that trip occurred? Just approximately what month, for instance?
A. The end of March.
Q. Of 1993?
A. Of '93. Correct.
Q. Excuse me, my allergies are acting up today. How did you get to Las Vegas?
A. By jet, private jet.
Q. And who was with you on the jet?
A. My son Jordan, Lily, myself and Michael.
Q. And when you got to Las Vegas, where did you stay, what hotel?
A. The Mirage Hotel.
Q. And when you got to The Mirage Hotel, do you remember what time of day or night it was?
A. No.
Q. Do you remember how long you stayed in Las Vegas on this occasion?
A. Two or three nights.
Q. Now, when you got to Las Vegas, did you have -- obviously you had a room --
A. Correct.
Q. -- in The Mirage. 5616

And who was in your room when you first got there? Who was staying in your room?
A. Jordan, myself, Lily and Michael.
Q. All in the same room?
A. Correct.
Q. Now, did those arrangements change at any point in time?
A. Yes.
Q. And when did they change?
A. The second night things changed.
Q. With regard to “things changed,” could you tell me what changed first?
A. Well, there were approximately three bedrooms in that suite at the Mirage Hotel. Lily and I were staying in one bedroom, Jordie had another bedroom, and Michael had another bedroom. The second night, they were going to see a performance, Cirque du Soleil performance.
Q. “They” meaning who?
A. Jordie and Michael --
Q. Okay.
A. -- and Lily and I. It was around 11 p.m. at night, and I got a call from somebody at Cirque du Soleil saying, “Where is Michael?” And I said, “He should be there with my son.” They said, “He’s not here.”
A little while later, another call, he still didn’t show up. They still did not show up. And 5617

I -- there's a knock on the door and it's Michael and Jordan, and they came back into the suite. Michael --

Q. Now, let me stop you right there, okay?

A. Yes.

Q. About what time is it when your son Jordan and the defendant in this case, Mr. Jackson, showed up?

A. Well, I think the performance started at 11:00, and I would say Jordan and Michael showed up around 11:30.

Q. Now, could you describe for the jury Mr. Jackson's demeanor at the time that they came back to the room?

A. He was sobbing. He was crying, shaking, trembling.

Q. Michael Jackson was?

A. He was.

Q. And what about your son's demeanor?

A. He was quiet.

Q. Now, at that point in time, did Mr. Jackson tell you why he was upset or crying?

A. Yes.

Q. All right. Tell the jury what he said.

A. He said, "You don't trust me? We're a family. Why are you doing this? Why are you not allowing Jordie to be with me?" And I said, "He is with you." 5618

He said, “But my bedroom. Why not in my bedroom? We fall asleep, the kids have fun. Boys” --

MR. MESEREAU: Objection. Nonresponsive; narrative.

THE COURT: Narrative; sustained.

Q. BY MR. SNEDDON: All right. Tell us what - Mr. Jackson said that he wanted your son to sleep with him in his bed - what you said to Mr. Jackson.

A. What I said to Michael was, “This is not” -- “This is not anything that I want. This is not right. Jordie should be able to do what he wants to do. He should be able to fall asleep where he wants to sleep.”

Q. Is this you talking or Mr. Jackson speaking?

A. I was saying this. And Michael was trembling and saying, “We’re a family. Jordie is having fun. Why can’t he sleep in my bed? There’s nothing wrong. There’s nothing going on. Don’t you trust me?”

Q. All right. How long do you think this conversation lasted between you and Mr. Jackson over where Jordan was going to sleep that night?

A. I would say 20 to 30, 40 minutes.

Q. So it was a back-and-forth conversation; is that right?

A. Yes.

Q. Do you recall how many times during that 5619

conversation that Mr. Jackson emphasized the fact
that you didn't trust him?
MR. MESEREAU: Objection; leading.
THE WITNESS: No, I don't recall how many
times --
THE COURT: Just a moment.
THE WITNESS: I'm sorry.
THE COURT: Overruled.
Go ahead. You may answer.
Q. BY MR. SNEDDON: Go ahead.
A. I don't recall how many times.
Q. Was it on more than one occasion?
A. Absolutely, yes.
Q. Was it on many occasions?
A. Quite a few.
Q. Do you remember how many times during the
conversation that Mr. Jackson emphasized to you that
you were family?
A. Many times.
Q. Did you at some point in time relent and
allow your son to sleep with Michael Jackson in his
bedroom?
A. Yes, I did.
Q. And was it after that discussion on that
night?
A. Yes.
Q. Is that the first occasion?
A. Correct. 5620

Q. When you were in Las Vegas, do you remember how many of the nights in Las Vegas that your son Jordan slept with the defendant, Michael Jackson, in Michael Jackson's room?
A. I would say two occasions.
Q. Now, at some point in time after you had agreed to let your son Jordan sleep with Mr. Jackson, were you the recipient of a gift from Mr. Jackson?
A. Yes, I was.
Q. Would you describe that to the jury?
A. It was a gold bracelet, and it was given to me by Michael.
Q. And you say "a gold bracelet." Had you seen that gold bracelet in a shop of some kind before?
A. I had seen it before, yes.
Q. And the brand name on that bracelet?
A. Cartier.
Q. Was it expensive, to your knowledge?
A. Oh, I -- yes, it was.
Q. When was it you received this gift in relationship to having agreed to allow your son to sleep in bed with Mr. Jackson?
A. I think it was the next evening when we were attending a show, a magic show, by David Copperfield.
Q. Mrs. Chandler, do you recall after Las Vegas where you went, where you personally and Jordan 5621

went? When you came back from Vegas, where did you go; do you recall?
A. After Vegas, I -- it could be back to Disneyland, back to Neverland, or home. I'm not exactly certain.
Q. Was Mr. Jackson with you wherever it was that you went? Did he go back with you, in other words?
A. Yes, he did.
Q. And did Mr. Jackson continue to spend his nights with your son in the same room, in the same bed, from Las Vegas, from that point on?
A. Yes.
Q. Were there other visits to Neverland Valley Ranch after you came back from Las Vegas?
A. Yes, there were.
Q. And were there occasions when your son went up to the ranch where you and Lily did not accompany him to the ranch?
A. Yes.
Q. Do you remember on how many such occasions?
A. I would say two or three times.
Q. And were there occasions also where you and Lily and Jordan also went up to the ranch after Las Vegas?
A. Yes.
Q. And on those occasions when you went up to the ranch after Las Vegas, where did you stay? 5622

A. I stayed in the guest cottages.
Q. And where did Lily stay?
A. In the guest cottages.
Q. And where did Jordan stay?
A. In Michael Jackson's bedroom.
Q. Were there ever any occasions that you recall where you actually, when you got to the ranch, that you would take Jordan's suitcase in and take it into Mr. Jackson's bedroom and leave it there?
A. Possibly.
Q. So you knew that he was going to be spending the night with Michael Jackson in Michael Jackson's bedroom at this point in time?
A. Yes.
Q. Now, were there occasions after you got back from Las Vegas -- let me -- where Mr. Jackson actually was invited to stay at your residence where you lived at this point in time?
A. Yes.
Q. Now, what city was it that you lived in at this time?
A. Santa Monica.
Q. We're talking about 1993, in the spring, right?
A. Correct.
Q. Okay. Where did you live?
A. Santa Monica. 5623

Q. And at this point in time, was Mr. Schwartz living with you?
A. No, he wasn't.
Q. So in the household was there anybody besides you and Jordan and Lily?
A. My housekeeper.
Q. And was that a full-time housekeeper?
A. Yes, she was.
Q. 24 hours a day?
A. Yes.
Q. Did she live in the house?
A. Yes, she did. She was a live-in.
Q. That's what I meant. Sorry. Clumsy question.
And during this time, did Mr. Jackson ever spend the night at your residence?
A. Yes, he did.
Q. And do you recall on how many occasions Mr. Jackson spent the night at your residence?
A. I would say more than 30 times.
Q. And were some of those occasions on consecutive days or nights?
A. Yes.
Q. And how long consecutively do you think that that occurred?
A. Oh. It could be a week or two at a time.
Q. Where did Mr. Jackson stay in the house?
A. In Jordan's bedroom. 5624

1 Q. Are there more than one bed in that room?
2 A. No.
3 Q. I am assuming that Jordan was going to
4 school during this period of time.
5 A. He was.
6 Q. So Mr. Jackson would spend the night there.
7 What would happen when Jordan would go to school?
8 To your knowledge, what did Mr. Jackson do?
9 A. Michael would leave.
10 Q. And approximately what time would he return?
11 A. After Jordan came home from school.
12 Q. And so was this the routine that was
13 followed during the time that Mr. Jackson was
14 staying at your residence?
15 A. Yes.
16 Q. Did you ever -- have you ever been to Disney
17 World --
18 A. Yes.
19 Q. -- in Orlando, Florida?
20 A. Yes.
21 Q. And have you been to Disney World with the
22 defendant in this case, Michael Jackson?
23 A. Yes.
24 Q. And do you remember approximately when it
25 was that you went to Disney World with Mr. Jackson?
26 A. I would say in May.
27 Q. Of '93?
28 A. Of '93. 5625

Q. And when you went to Disney World with Mr. Jackson, who else went with you?
A. Jordan and Lily.
Q. Do you recall where you stayed?
A. I recall The Grand Floridian was one hotel.
Q. And during the time that -- do you remember how many days -- did you go there on more than one occasion?
A. Yes, we did.
Q. How many occasions?
A. Twice.
Q. And do you recall what the sleeping arrangements were on the first occasion?
A. Jordie was with Michael and Lily was with me.
Q. And when you say “with Michael” --
A. In Michael’s bedroom.
Q. Now, during the time that you visited Disney World in Orlando, would you describe the nature of the relationship that was going on, that you observed personally, between the defendant in this case, Michael Jackson, and your son Jordan?
A. The behavior, you say?
Q. Yeah.
A. The behavior with my son was he was not wanting to be with Lily and I anymore, and he was just with Michael the whole time, and he wasn’t too happy. Just -- well, I couldn’t -- I didn’t have 5626

any communication with him really.
Q. Was this something that you observed for the first time in Orlando or was this something that you began to observe over a period of time?
A. It was a period of time, and it gradually happened.
Q. Did you notice any change in your son --
A. Yes.
Q. -- Jordan?
A. Yes.
Q. What was the nature of the change?
A. Well, he started dressing like Michael. He started acting withdrawn, sort of smart-alecky. Not as sweet as he normally was. And withdrawn. He just didn't want to be with us, Lily and I.
Q. Had you always been close prior to that?
A. Extremely close.
Q. Do you -- I think you answered this, but just in case, how many days did you think you were in Florida?
A. Oh, I don't really remember, but it's probably more than two nights. Two, three nights.
Q. And after you came back from Florida, do you recall where you went?
A. After that, I think the next trip was to Monaco.
Q. In between the time that you went to Florida and to Monaco, do you recall where you were -- where 5627

you were personally staying?
A. No. I guess home.
Q. Do you remember how much time elapsed between the two trips?
A. Not really, no.
Q. Was it more than a month, more than a week? Obviously it was more than a day or so.
A. Yes. It was a couple -- it could be three weeks.
Q. And during that time when you got back from Florida till the time that you left for Monaco, were you with Mr. Jackson?
A. At times.
Q. And the times that you were with Mr. Jackson, was Jordan with Mr. Jackson?
A. Yes.
Q. And when he's with Mr. Jackson, where did he sleep?
A. With Mr. Jackson.
Q. Do you know somebody by the name of Joy Robeson?
A. Yes.
Q. Do you know somebody by the name of Wade Robeson?
A. Yes.
Q. And do you recall where it was that you met Joy Robeson?
A. Yes, I do. 5628

Q. Where was that?
A. That was at Neverland, one of the visits.
Q. Do you recall when it was that you met Wade Robeson?
A. One of the visits to Neverland.
Q. And do you recall approximately which visit it would have been or what month it would have been that you met these individuals?
A. It could have been my third visit to Neverland.
Q. Did you meet them on more than one occasion?
A. I met Wade on more than one occasion, yes.
Q. And how many times did you meet Joy Robeson?
A. One.
Q. One occasion?
A. That I remember.
Q. There were occasions when Wade Robeson was there that the mother was not there?
A. Correct.
Q. Now, you've indicated to the jury on at least one occasion, perhaps two, that Brett Barnes was also at Neverland Valley Ranch?
A. Yes, he was there too.
Q. And did you ever meet Brett Barnes' mother?
A. No.
Q. So he was at the ranch by himself also?
A. Oh, yes. Yes, he was.
Q. Did you ever meet a Mr. Robeson, the father? 5629

A. No. No, not that I remember.
Q. Did you ever meet a Mr. Barnes at any point?
A. Not that I remember, no.
Q. So no fathers in the picture?
A. No.
Q. Now, prior to the time that you met Joe Robeson for the first time - okay? --
A. Yes.
Q. -- on your visit to Neverland Valley Ranch, did you have a discussion with the defendant in this case, Mr. Jackson, with regard to some warnings that Mr. Jackson gave you about Joy Robeson?
A. Yes.
Q. What did Mr. Jackson tell you?
MR. MESEREAU: Objection. Relevance.
MR. SNEDDON: I think it's an admission of Mr. Jackson with regard to the relationship with the boys.
MR. MESEREAU: Relevance and hearsay.
THE COURT: I'm not sure what you're trying to introduce. I'm searching my memory for that. I don't know, maybe you should approach with counsel.
MR. SNEDDON: Thank you, Your Honor.
(Discussion held off the record at sidebar.)
Q. BY MR. SNEDDON: Mrs. Chandler?
A. Yes.
Q. Okay. Now, you had a conversation with Mr. Jackson, is that correct? 5630

A. Yes.
Q. Now, at the time -- and please do not tell us what was said, but did you subsequently have a conversation with Miss Robeson --
A. Yes, I did.
Q. -- wade's mother?
A. Correct.
Q. Okay. Now, after that conversation, did you develop any concerns about some of the things that she had told you?
A. I --
Q. I think you have to answer that "yes" or "no." We don't want to get into what she said.
A. Yes.
Q. And with regard to that particular conversation, let me ask you this: Had you been invited by the defendant in this case, Mr. Jackson, to go on a tour with him, you and Jordan?
A. Yes.
Q. And where were you invited by Mr. Jackson to go on a tour?
A. I don't know where the tour was going. I guess a world tour somewhere in the summertime.
Q. Do you know where Miss Robeson, Mrs. Robeson, was from, what country?
A. Australia.
Q. Do you know whether one of the stops on that tour was going to be Australia? 5631

A. I think it was, yes.
Q. Okay. Let's talk a little bit about your trip to France.
A. Yes.
Q. Do you recall approximately when that was?
A. I think the middle of May.
Q. And how did you get there?
A. We flew.
Q. And was it on a charter or a commercial airline?
A. Commercial airline.
Q. And you say "we," so could you tell us who it was that you went with?
A. My daughter, my son and Michael.
Q. And when you got to France, where in France did you stay?
A. Monaco.
Q. And how long were you in Monaco?
A. Approximately four days.
Q. And during the time that you were there, where did your son Jordan sleep?
A. In Michael Jackson's bedroom.
Q. Now, did you ever go into that bedroom?
A. Yes.
Q. And were they in bed together on occasion?
A. On occasion, yes.
Q. Now, during the time that you were in Monaco, did you do any shopping? 5632

A. Yes.
Q. And how was it that you -- well, let me put it this way: Who went shopping with you?
A. My daughter.
Q. You and Lily?
A. Yes.
Q. And how many days did you do that?
A. Oh. One day.
Q. And who was paying for the --
A. Michael was.
Q. I'm sorry?
A. Michael was.
Q. And how did he arrange that?
A. I think I was given a credit card, his credit card.
Q. So you went shopping in Monaco on Michael Jackson's credit card, you and your daughter?
A. Yes.
Q. Now, during this trip, did either your son or Mr. Jackson get ill?
A. Yes, they both did.
Q. They had the flu?
A. Yes.
Q. And were they in the room together the entire time?
A. Yes.
Q. And when you went to France, did you go to any other country, any other places in France, other 5633

than Monte Carlo?
A. We also went to Euro Disney outside of Paris.
Q. And do you recall how long you were there?
A. A couple of days.
Q. Again, when you say “we,” you’re talking about Jordan and Lily, and was the defendant with you?
A. Yes, he was.
Q. And you say you spent a couple of days. Where did Jordan sleep?
A. With Michael Jackson.
Q. Now, do you have a brother?
A. Yes, I do.
Q. What’s your brother’s name?
A. I have two brothers.
Q. What are their names?
A. Steven Wong and Dale Wong.
Q. And was there a time when one of your brothers -- where do they live? Let’s go that way.
A. One lives in Los Angeles. And the other lives back east in New Jersey.
Q. And was there a time when you went back east for a family wedding?
A. Yes.
Q. Do you remember about what month that was?
A. That was in September.
Q. And do you recall who it was who was getting 5634

1 married?
2 A. Yes.
3 Q. Who was that?
4 A. That was my brother Steve and his wife.
5 Q. And when you went back for the wedding, what
6 city did you go to?
7 A. We went to New York City.
8 Q. And when you went back there, who went with
9 you?
10 A. My son, my daughter, and myself.
11 Q. And when you first got there, where did you
12 stay?
13 A. We stayed in a hotel.
14 Q. Do you remember the name of the hotel?
15 A. Yes, The Rega Royal Hotel.
16 Q. And do you know who made the arrangements
17 for that hotel?
18 A. Yes, I do.
19 Q. Who was that?
20 A. Norma Stakos.
21 Q. And do you know who Mrs. Stakos is? Had you
22 had prior dealings with Mrs. Stakos?
23 A. Yes.
24 Q. On a number of occasions?
25 A. Telephone conversations only.
26 Q. And who did she work for?
27 A. She worked for Michael Jackson.
28 Q. And so she made the reservations for you at 5635

the hotel?
A. Yes.
Q. When did you learn that Mr. Jackson was going to be with you in New York? Before or after you left?
A. Before.
Q. Do you remember how many days before you learned that?
A. Not really, no. I don't remember.
Q. On the day of the actual wedding, was Mr. Jackson there?
A. No, he was not.
Q. When did he show up in relationship to the wedding?
A. After the wedding.
Q. Do you remember how many days he showed up, how many days later?
A. It could be two days later.
Q. Now, when Mr. Jackson got there, did you see him?
A. That evening briefly.
Q. Okay. Now, had something happened during the time that you were in New York with your son Jordan before Mr. Jackson arrived which caused some problems in the family?
MR. MESEREAU: Objection. Leading and vague.
THE COURT: Overruled. 5636

You may answer.
THE WITNESS: Yes.
Q. BY MR. SNEDDON: What was it?
A. Jordan was spending too much time with Michael. I was getting upset. My brother was also with me, and he was saying --
MR. MESEREAU: Objection; hearsay.
Q. BY MR. SNEDDON: Don't tell us what he said, but --
A. Okay.
Q. -- could you describe his demeanor to us?
A. Jordan was not with us. He didn't want to be with us. He was very -- he was sullen.
Q. Now, during this time, Mr. Jackson was not there, correct?
A. Correct.
Q. And to your knowledge, from your own personal knowledge, were Mr. Jackson and your son Jordan in communication with each other during this period of time?
A. Yes.
Q. By what method?
A. Telephone.
Q. And the frequency?
A. Often. Often. Long conversations.
Q. And was your brother upset by the situation, too?
A. Yes. 5637

MR. MESEREAU: Objection; leading.
THE COURT: Sustained.
MR. MESEREAU: Move to strike.
THE COURT: Stricken.
Q. BY MR. SNEDDON: Could you describe to the -- describe your brother's reaction to this situation that was -- that existed between Mr. Jackson and your son Jordan.
A. Yes. My brother was happy for Jordan, but he didn't like that Jordie was just spending time with Michael and not with his family.
Q. Now, when Mr. Jackson showed up in New York, do you recall where he was staying?
A. Yes, he was staying across the hallway from my room.
Q. And when Michael Jackson showed up, where did Jordan sleep?
A. When Michael Jackson showed up, he slept in Michael's room.
Q. Now, when Mr. Jackson showed up the first night, was there an incident that occurred in your room?
MR. MESEREAU: Objection; leading.
THE WITNESS: My room?
Q. BY MR. SNEDDON: Yeah.
A. Yes, there was an incident.
MR. SNEDDON: You have to wait till the Judge rules. 5638

THE COURT: Overruled.
You can answer.
Q. BY MR. SNEDDON: Okay, you can answer now.
A. Yes, there was an incident.
Q. Who was involved in the incident?
A. My daughter Lily --
Q. Okay.
A. -- Michael and Jordan.
Q. And when you got back to your particular room, did you notice any damage in the room?
A. Yes, I did.
Q. And what was damaged?
A. I noticed there was damage in the morning. There were two lamps that were broken.
Q. Now, did you at some point talk to Mr. Jackson about what had happened the night before?
A. Yes.
Q. And with regard to that conversation, did it involve Jordan?
A. Yes, it did.
Q. And did it involve you?
A. Yes, it did.
Q. And did it involve Mr. Jackson?
A. Yes, it did.
Q. And the relationship between the two or three of you?
A. Yes.
Q. Would you tell the jury what the 5639

conversation was about?
MR. MESEREAU: Objection to the extent it calls for hearsay.
MR. SNEDDON: Your Honor, this involves the defendant and it involves statements that he makes.
THE COURT: But that's not the question you asked. I'll sustain the objection.
Excuse me. Sustain the objection.
Q. BY MR. SNEDDON: All right. Let's do it this way. What did Mr. Jackson say about the situation?
A. "Why can't we be a family? Why are you objecting to Jordie staying with me? Why can't we be a family? Why don't you trust me?"
He was upset that I wanted my son back; that I -- I didn't like the situation. It was getting out of hand.
Q. Now, you've told the ladies and gentlemen of the jury that Mr. Jackson had given you a bracelet at one point in time and that you had gone shopping with Mr. Jackson on his credit card in Monte Carlo. Were there any other occasions when Mr. Jackson gave you gifts?
A. Yes.
Q. What else did he give you?
A. He also gave me jewelry.
Q. And do you recall approximately when that was? 5640

A. I think it was approximately in June.
Q. And what kind of jewelry?
A. A pair of earrings, a necklace, and a ring.
Q. And where were these items when you first saw them?
A. The boxes were open on my bed in Santa Monica.
Q. At your house?
A. Yes.
Q. Was Mr. Jackson staying at your house at that point in time?
A. Not really. Not really. He was there, in and out.
Q. In and out. Okay. Any other gifts you ever received from Mr. Jackson?
A. Yes, a gift certificate to a store.
Q. And the store?
A. To a store.
Q. Yes. The store?
A. Fred Segal.
Q. Now, to your knowledge, was there ever an occasion where your son Jordan and the defendant in this case, Michael Jackson, were at your ex-husband's house, Evan Chandler?
A. Yes. Yes.
Q. And do you remember on how many occasions?
A. I would say one or two occasions.
Q. And do you remember the length of the stays 5641

1 on those occasions that Jordan stayed there?
2 A. A few days each time.
3 Q. So during this period of time you had
4 custody of Jordan, correct?
5 A. Correct.
6 Q. Now, you told us, I think, that there were
7 two trips to Florida?
8 A. Yes.
9 Q. Do you remember when the second trip was?
10 A. After June. July, early July possibly.
11 Q. And do you recall how long you stayed there
12 on that occasion?
13 A. I would say two or three nights.
14 Q. And where did Jordan sleep on those
15 occasions?
16 A. With Michael.
17 Q. Did Lily go with you on that trip?
18 A. Yes, she did.
19 Q. Had Jordan's behavior or attitude changed in
20 any respect since the first time you described his
21 change from Florida, the first trip?
22 A. It was the same. Same.
23 Q. Father's Day is in June, okay?
24 A. Yes.
25 Q. Do you remember a situation where you were
26 with Jordan, your son, on Father's Day?
27 A. Yes.
28 Q. In 1993? 5642

A. Yes.
Q. I'm sure you were with him on other occasions. Do you recall where you were in 1993 on Father's Day?
A. Yes, I was in New York.
Q. And to your knowledge, in your presence, did Jordan call his father on Father's Day?
A. Eventually he did, yes.
Q. And initially, did you have a conversation with him?
A. Yes, I did.
Q. Did he want to call his father?
A. No, he didn't.
MR. MESEREAU: Objection. Hearsay; move to strike.
THE COURT: Sustained. Stricken.
Q. BY MR. SNEDDON: As a result of the conversation that you had with your son Jordan, did he eventually call his father?
A. I think he did, yes.
Q. All right. At some point in time, did you receive a message of some sort from your ex-husband Evan about Mr. Jackson?
A. Yes.
Q. And don't tell us what was said, okay? I just want to get the facts and the background to it. Where were you when you first heard the message?
A. In Michael Jackson's car. In his limo. 5643

Q. And was Mr. Jackson with you?
A. Not when I got that call.
Q. Did the call come directly to you or did you access it in some other fashion?
A. From another fashion.
Q. How was that?
A. Answering machine. I dialed in.
Q. So you dialed the answering machine on whose answering machine?
A. My answering machine at home.
Q. And there was a message on the machine from your ex-husband Evan, correct?
A. Correct.
Q. Did you at some point later play that message for Mr. Jackson?
A. I don't recall.
Q. Are you familiar with a person by the name of Anthony Pellicano?
A. Yes, I am.
Q. And who is Anthony Pellicano, to your knowledge?
A. A private investigator.
Q. And was Mr. Pellicano introduced to you by somebody?
A. By Bert Fields and Michael Jackson.
Q. In relationship to this voice message that you received on your message machine at your house, do you recall how many days after that particular 5644

message, you received that message, that you were introduced to Mr. Pellicano and Mr. Fields by Mr. Jackson?
A. It could be a week later.
MR. MESEREAU: Objection. Move to strike; misstates the evidence; and no foundation.
THE COURT: Sustained, stricken.
Q. BY MR. SNEDDON: Did you meet Anthony Pellicano through the defendant, Michael Jackson?
A. Yes.
MR. MESEREAU: Objection; leading.
THE COURT: Overruled. The answer is, "Yes." Next question.
Q. BY MR. SNEDDON: Did you meet Bert Fields through the defendant, Michael Jackson?
A. Yes.
Q. Were you present during conversations with Mr. Pellicano and Mr. Fields and Mr. Jackson?
A. Yes, I was.
Q. And this all occurred after the voice mail had been left on your message machine by your ex-husband Evan Chandler?
A. Yes, sir.
Q. Now, did the defendant, Michael Jackson, tell you who Anthony Pellicano was?
A. Yes, he did.
Q. What did he say about Mr. Pellicano?
A. "He can find out anything. He's really good 5645

1 at this. He's really good at investigating. If
2 you're having a problem, he'll get to the bottom of
3 it."
4 Q. And Mr. Fields, Bert Fields, is what -- you
5 know him by name. What occupation is he?
6 A. He's an attorney.
7 Q. And he's an attorney who works for who? Or
8 at this point in time, who did you know he was
9 working for?
10 A. He worked for Michael Jackson.
11 Q. Now, at some point in time, did you go to
12 Mr. Pellicano's office to be interviewed by Mr.
13 Pellicano?
14 A. Yes.
15 Q. And did somebody go with you?
16 A. Yes.
17 Q. Who was that?
18 A. My ex-husband, Dave Schwartz.
19 Q. And was there anybody else present during
20 this conversation?
21 A. I don't remember. It could be Bert Fields
22 also.
23 Q. Now, after that conversation, did you go
24 somewhere else? Do you recall where you went?
25 A. To Michael Jackson's home in Century City,
26 apartment in Century City.
27 Q. And was Mr. Jackson there?
28 A. He might have been. 5646

Q. At that particular location, was your son Jordan Chandler there, can you tell us?
A. Yes, he might have been there, too.
Q. Do you recall whether or not or do you recall an incident -- doesn't have to be on that particular occasion, but do you recall an occasion whether or not your son Jordan Chandler was ever interviewed by Anthony Pellicano?
A. Yes, he was.
Q. Where did that interview take place?
A. In the Century City apartment.
Q. Were you present?
A. Yes.
Q. Were you present during the conversation?
A. No.
Q. Where were you?
A. Upstairs or in his -- somewhere else.
Q. And do you recall how long that conversation took?
A. Could have been 45 minutes.
Q. Now, after Mr. Pellicano and Mr. Fields were introduced to you by Michael Jackson, were you involved in some issues involving a change in custody of your son Jordan?
A. Yes.
Q. And were you -- were you presented with some papers to sign?
A. Yes, I was. 5647

Q. And those papers did what?
MR. MESEREAU: Objection. Hearsay;
foundation; relevance.
THE COURT: Foundation; sustained.
Q. BY MR. SNEDDON: The papers were presented
to you by whom?
A. By Pellicano.
Q. And was Mr. Fields present?
A. I don't think at that time.
Q. Do you recall if the defendant, Michael
Jackson, was present?
A. No, he wasn't.
Q. At some point in time did you have a
conversation with Michael Jackson about signing
those papers?
A. I don't recall talking to Michael about the
papers.
Q. Do you recall giving a statement to an
attorney, a Deputy District Attorney with the Los
Angeles District Attorney's Office on September 3rd
of 1993?
A. Yes, I do.
Q. And it was Miss Lauren Weis?
A. Yes, it was.
Q. And you gave a rather lengthy statement to
Miss Weis?
A. Yes, I did.
Q. Do you recall telling Miss Weis that -- 5648

MR. MESEREAU: Objection. Leading; hearsay;
move to strike.
MR. SNEDDON: It's foundational, or to
refresh her recollection.
THE COURT: If you want to refresh her
recollection with something, you can approach her
and show the item.
MR. SNEDDON: All right. Counsel, page 95,
lines 15 to 19.
MR. MESEREAU: Objection. Foundation, Your
Honor.
THE COURT: You have to ask her if it will
help refresh her recollection, or it might.
MR. SNEDDON: Can I show it to her first?
That's the way counsel's been doing it.
MR. MESEREAU: No, I haven't at all.
THE COURT: Actually, he's been asking them
if it would refresh their recollection if he showed
them something.
MR. SNEDDON: All right.
Q. Do you recall that conversation?
A. Yes, I do.
Q. And -- and it occurred at a point in time
when things were a lot fresher in your mind than
they are now?
A. Yes.
Q. Would it help, perhaps, if you looked at the
statement, that it might help refresh your 5649

recollection?
A. Yes.
MR. SNEDDON: May I approach the witness,
Your Honor?
THE COURT: Yes.
Q. BY MR. SNEDDON: Just read it to yourself.
Start here and right down to here. How's that?
Counsel, I'm having her read lines 11 to
line 25.
MR. MESEREAU: I'm going to object to that.
That's improper refreshing of recollection and it's
hearsay, foundational, to have her just read it.
MR. SNEDDON: That's all I'm asking her to
do. I'm just trying to help you try to find out
where it is.
THE COURT: All right. Just let her look at
it. Counsel knows you can refresh a person's
recollection with anything.
MR. MESEREAU: Your Honor, I thought she was
reading it out loud. That was my mistake. I
withdraw the objection.
THE COURT: That would have been improper.
MR. SNEDDON: We've been down that road
before.
THE COURT: All right, I'm sorry. Did we --
where are we?
(Laughter.)
MR. SNEDDON: I know where we are. 5650

THE COURT: Is it break time yet? No.
(Laughter.)
MR. SNEDDON: I'm sorry, Judge. You're going to have to suffer for six more minutes and you're not getting out of here a minute early. Payback is you-know-what.
Q. All right. Mrs. Chandler, with regard to whether or not the defendant was present, did that refresh your recollection?
A. Yes, it does.
Q. And do you recall whether the defendant was present?
A. He was present.
Q. And does it refresh -- did the defendant, Michael Jackson, make statements to you with regard to the particular documents that you were being asked to sign?
A. Yes, he did.
Q. And do you recall what he told you?
A. He was frantic. He was begging me to, "Come over and sign this so there won't be any lawsuits or anything. Just sign it, sign it."
Q. And, in effect, what you signed did what to you personally?
MR. MESEREAU: Objection. Hearsay; foundation.
MR. SNEDDON: Let me go back, Judge. I think I can correct this. 5651

Q. I am assuming you read the document before you signed it?
A. Briefly.
Q. And you understood what it meant when you were signing it?
A. Not really.
Q. Okay. You understood -- well, let me ask you this: Did you understand -- if you didn't understand all of it, you understood some of it, correct?
A. Yes, I did.
Q. Did you understand a part of it that had to do with who was going to have custody for the children temporarily?
A. Exactly, yes.
MR. MESEREAU: Objection; leading.
THE COURT: Overruled.
Q. BY MR. SNEDDON: I'm sorry?
A. Yes.
Q. And it wasn't going to be you anymore?
A. Exactly.
Q. Did you sign that paper?
A. I did.
Q. Mrs. Chandler, I neglected to ask you about one other incident that occurred at Neverland Ranch, okay?
A. Yes.
Q. So pardon me if we can go back in time from 5652

where we are presently. And then we're almost done, okay?
A. Okay.
Q. Do you recall whether there was ever any occasion where your brother and your sister-in-law ever visited Neverland Valley Ranch?
A. Yes, I do recall.
Q. Do you know approximately when it was that they visited Neverland Valley Ranch?
A. Approximately May.
Q. And do you know how long they were there?
A. For the day.
Q. Just came up for the day?
A. Yes. For the day.
Q. And do you recall, were you with them while they were at the ranch?
A. Yes, I was.
Q. Was Jordan at the ranch?
A. Yes, he was.
Q. Where was Jordan?
A. With Michael.
Q. Now, do you remember about what time it was when you left that day, you personally?
A. Before eight o'clock.
Q. Eight o'clock --
A. P.m.
Q. P.m. Now, do you recall seeing Mr. Jackson and Jordan before you left? 5653

A. Yes.
Q. And where did you see them?
A. They were in Michael Jackson's bedroom.
Q. And do you recall -- did you go into the bedroom?
A. Yes.
Q. Did you go in there with your brother and sister-in-law?
A. Yes, we did.
Q. And when you went into the bedroom, where was Mr. Jackson?
A. In the bedroom with Jordan.
Q. Do you recall where?
A. Could be on the bed.
Q. You don't remember specifically?
A. Not specifically.
Q. Okay. And Jordan, do you recall where he was?
A. On the bed, too.
Q. Now, at some point in time, Mrs. Chandler, your son Jordan Chandler was involved in a lawsuit, Chandler versus Jackson, a civil lawsuit. Do you recall that?
A. Yes, I do.
Q. And were you a participant in that lawsuit as a representative of your son?
A. Yes, I was.
Q. And who was the lawyer who represented your 5654

son during the majority of that litigation?
A. Larry Feldman.
Q. And to your knowledge, was a lawsuit filed on behalf of your son against the defendant, Michael Jackson?
A. Yes.
Q. And did you assist or help Mr. Feldman in the preparation of that lawsuit?
A. Yes.
Q. And did you support your son during that lawsuit?
A. I did.
Q. Now, as a result of the lawsuit, did your son -- and please -- don't tell us the amount, please. Did your son receive monetary compensation from Mr. Jackson?
A. Yes, he did.
Q. Now, also as a result of that lawsuit, did you receive some monetary compensation?
A. Yes, I did.
Q. Did you ever ask to be compensated in any way as a result of what had happened?
A. No.
MR. MESEREAU: Objection. Foundation; and hearsay.
THE COURT: All right. Overruled.
Q. BY MR. SNEDDON: You did not?
A. No. 5655

Q. And where did the idea for you receiving compensation come from, to your knowledge?
MR. MESEREAU: Objection, to the extent it calls for hearsay.
THE COURT: Sustained.
Q. BY MR. SNEDDON: As a result of this lawsuit, did you receive money?
A. Yes, I did.
Q. Did you have to sign something in exchange for that money?
A. Yes, I did.
Q. And what did you sign?
A. A disclosure agreement.
Q. And what does that mean?
A. Confidentiality agreement.
THE COURT: All right. Let's take our break.
(Recess taken.)
THE COURT: Go ahead.
Q. BY MR. SNEDDON: Mrs. Chandler, I just have a couple of questions.
I want to go back to something we talked about before. You told the jury that the defendant, Michael Jackson, gave you a gift certificate at one point in time?
A. Correct.
Q. And it was to Segal?
A. Fred Segal is a store in Santa Monica.
Q. Okay. And what was the amount of that 5656

certificate?
A. $7,000.
Q. Okay. Now, let's just go back and finish up the last part of what we were talking about. With regard to the lawsuit, you signed some kind of an agreement, correct?
A. Correct.
Q. In exchange for that, you were given some money?
A. Yes.
Q. Do you recall, based upon what you know, what the agreement was, what it required of you?
MR. MESEREAU: Objection; hearsay.
THE COURT: Sustained.
Q. BY MR. SNEDDON: What did you give up in return for receiving money?
MR. MESEREAU: Same objection. Hearsay and foundation.
THE COURT: Sustained.
Q. BY MR. SNEDDON: Did you read the agreement before you signed it?
A. Yes.
Q. And who presented it to you?
A. Larry Feldman.
Q. Did he go over it with you before you signed it?
A. Yes.
Q. And you understood what you were signing? 5657

A. Yes, we did.
Q. And you read the document?
A. Yes.
Q. And what did it require you to do in order
to obtain money from the defendant, Mr. Jackson?
You personally.
A. We couldn't --
MR. MESEREAU: Objection. Hearsay and
foundation.
THE COURT: Sustained.
Q. BY MR. SNEDDON: Have you ever written any
books --
A. Never.
Q. -- about what happened?
A. No, I have not.
Q. Did any interviews?
A. Never.
Q. Made any money selling anything --
A. No.
Q. -- about your experience?
A. No.
MR. SNEDDON: Nothing further.
THE COURT: Cross-examine?
MR. MESEREAU: Yes, please, Your Honor.

CROSS-EXAMINATION
BY MR. MESEREAU:
Q. Mrs. Chandler, my name is Tom Mesereau and I 5658

speak for Michael Jackson, okay?
A. Yes.
Q. If anything I ask you is not clear, please don't answer. Just say you don't understand it, and I'll try to rephrase it, okay?
A. Okay.
Q. Now, in response to the prosecutor's questions, you said you entered into a stipulation regarding custody of your son Jordie, correct?
A. Correct.
Q. And in response to the prosecutor's questions, you said you did it because Michael Jackson told you to do it, right?
A. One of the people. He was one.
Q. Well, do you remember signing a sworn declaration regarding that stipulation?
A. I remember signing something about custody of Jordie.
Q. Do you remember signing a sworn declaration in which you said the only reason you signed the stipulation was because your ex-husband wouldn't return Jordie to you if you didn't, right?
A. Correct.
Q. And you said further, you thought the stipulation was merely for a one-week visitation period, right?
A. Correct.
Q. Nowhere in that declaration did you say 5659

anything about Michael Jackson telling you to sign anything, right?
A. That's not correct.
Q. Would it refresh your recollection to look at your declaration?
A. I'd be happy to.
MR. MESEREAU: May I approach, Your Honor?
THE COURT: Yes.
Q. BY MR. MESEREAU: Miss Chandler, have you had a chance to look at that sworn declaration?
A. Yes, I have.
Q. Does it refresh your recollection about what you said in the declaration?
A. Sort of.
Q. Isn't it true you said the only reason you signed it was because your ex-husband told you that if you didn't sign the stipulation, you would not have Jordan returned to you, right?
A. That's correct.
Q. You said that was the only reason, correct?
A. That's not the only reason.
Q. Well, you signed it under penalty of perjury, did you not?
A. I wasn't asked who else was asking me to sign it.
Q. Who prepared the declaration for you to sign?
A. Evan Chandler's attorney. 5660

Q. Were you represented by counsel when you signed this declaration?
A. Oooh. I might have been.
Q. You actually were, weren't you?
A. I -- I don't recall.
Q. You were represented by counsel because you were trying to set aside the stipulation in court, right?
MR. SNEDDON: Well, Your Honor, I'm going to object to that. That's misleading as to point and time, and vague.
MR. MESEREAU: It's not misleading at all.
MR. SNEDDON: Wait a minute, Counsel. Judge, I object as vague as to time as to when she was represented.
THE COURT: All right. I'll sustain the objection. It's an argumentative question.
Q. BY MR. MESEREAU: Miss Chandler, at some point you hired a lawyer to help you set aside that stipulation, right?
A. I don't know if that was the reason why an attorney was hired, if it was for that reason.
Q. And your attorney prepared your declaration, true?
A. I don't recall.
Q. Do you recall if the stipulation was ever set aside by your attorney?
A. I don't recall. 5661

Q. Do you recall being represented by an attorney named Freeman?
A. Yes, I do.
Q. And who is Mr. Freeman?
A. He’s an attorney that represented me for a short time.
Q. Do you recall asking Michael Jackson if he would loan David Schwartz four million dollars?
A. Never.
Q. You say you never did that?
A. Never did that.
Q. Okay. Do you recall your ex-husband David Schwartz asking you to do that?
A. Never.
Q. Do you recall him being five million dollars in debt around the time you were associating with Michael Jackson?
A. No.
Q. Don’t recall that at all?
A. Not at all.
Q. Okay. When you sued Michael Jackson, you sued through Larry Feldman, true?
A. I did not sue Michael Jackson. Jordan Chandler and his family were -- that was his family. We did not sue Michael Jackson.
Q. Okay. So you never sued him yourself, you’re saying?
A. I don’t believe that’s how it was worded. 5662

1 Q. Okay. Do you recall meetings with your
2 attorney about that lawsuit?
3 A. Yes, I do.
4 Q. Now, you -- you and Jordan's father Evan
5 were divorced in 1985, true?
6 A. Correct.
7 Q. And you obtained sole custody of Jordan,
8 right?
9 A. Yes.
10 Q. And you had an informal arrangement where
11 Evan could have custody or at least visitation
12 rights of Jordie from time to time, correct?
13 A. Correct.
14 Q. What year did you marry David Schwartz?
15 A. 1985.
16 Q. Now, is it correct that he became Jordan's
17 stepfather?
18 A. Correct.
19 Q. And for how long was he Jordie's stepfather?
20 A. For approximately six to eight years.
21 Q. What year did he cease to be Jordie's
22 stepfather?
23 A. When we divorced.
24 Q. And what year was that?
25 A. 1994.
26 Q. And how old is Jordie now?
27 A. He is 25 years old.
28 Q. Can I ask you when you last spoke to him? 5663

A. 11 years ago.
Q. At one point, David Schwartz sued Michael Jackson, correct?
A. I don't recall.
Q. Do you recall him suing Michael Jackson claiming that Michael had interfered with his business?
MR. SNEDDON: Your Honor, I'm going to object as immaterial; irrelevant; calls for hearsay.
THE WITNESS: I don't recall.
THE COURT: It's vague as to time.
MR. MESEREAU: Okay. I'll rephrase it, Your Honor.
Q. Around the time you and Evan and Jordie sued Michael Jackson with Attorney Larry Feldman, do you recall your ex-husband, David Schwartz, also suing Michael Jackson?
MR. SNEDDON: Same objection, Your Honor.
THE WITNESS: I don't recall.
THE COURT: Overruled.
You may answer.
THE WITNESS: I don't recall.
Q. BY MR. MESEREAU: Okay. Do you recall, in response to your lawsuit, Mr. Jackson suing for extortion?
MR. SNEDDON: Your Honor, I'm going to object to that question.
THE COURT: Sustained. Foundation. 5664

Q. BY MR. MESEREAU: You sued Michael Jackson, right?
A. Jordan Chandler sued Michael Jackson.
Q. Were you listed as a plaintiff?
A. Yes.
Q. And in response to your suit, Mr. Jackson sued for extortion, true?
A. I don't recall.
Q. Okay. Were you and Evan and Jordie all represented by Larry Feldman?
A. Yes, we were.
Q. Do you know approximately when that suit settled?
A. I guess in '95.
Q. Do you recall Evan suing Mr. Jackson a second time?
A. No.
Q. Don't know anything about that?
A. Nothing.
Q. Never heard about it?
A. No.
Q. Do you know who Attorney Barry Rothman is?
A. Yes.
Q. Who is Attorney Barry Rothman?
A. He was Evan Chandler's attorney.
Q. Do you recall Attorney Barry Rothman also suing Michael Jackson?
A. No, I don't. 5665

Q. Okay. Now, during your trips with Michael Jackson, do you recall the name “Sony” ever being mentioned?
A. Yes.
Q. And in what context was Sony mentioned?
A. The gifts that Michael Jackson gave were from Sony. Sony recorders. We flew on the Sony jet. That’s what I remember.
Q. And do you recall, around the time you were associating with Michael Jackson, that Michael Jackson had an endorsement deal with PepsiCo?
A. Yes.
Q. And to your knowledge, that was the most lucrative endorsement deal anyone in the music business had ever entered into with PepsiCo, correct?
A. I didn’t know that.
MR. SNEDDON: Your Honor, that’s immaterial and irrelevant.
THE COURT: Foundation; sustained.
Q. BY MR. MESEREAU: Do you recall learning from Michael Jackson that he owned an interest in The Beatles’ catalog?
A. Yes.
Q. Did you discuss that with Mr. Jackson?
A. Never.
Q. Did you discuss his deal with PepsiCo with Mr. Jackson? 5666

A. No.
Q. When you filed your lawsuit against Mr. Jackson, your attorney was threatening to ruin Mr. Jackson's music deals, correct?
A. No. Not that I recall.
Q. You don't recall that at all?
A. Not at all.
Q. Do you recall participating in settlement negotiations?
A. Yes.
Q. And when you participated in settlement negotiations, where did you used to meet?
A. Larry Feldman's offices.
Q. When did you last talk to Larry Feldman?
A. Oh, a few days ago.
Q. Did you talk about what you were going to say in court?
A. No.
Q. Did you talk about what he said in court?
A. Briefly.
Q. Did he call you or did you call him?
A. I called him.
Q. Before this discussion a few days ago, when was the last time before that you had spoken to Larry Feldman?
A. Oh, um, maybe two months before that.
Q. And did you talk to him about this case in that discussion? 5667

A. Yes.
Q. Did you talk to him about what you were going to say?
A. No.
Q. Did you call him or did he call you?
A. I called him.
Q. Did you talk on the phone with him or did you meet with him?
A. Yes, talk on the phone.
Q. Before that discussion, when had you last spoken to Attorney Larry Feldman?
A. Perhaps ten years ago.
Q. Okay. But you never discussed anything about this case in those discussions, right?
A. No.
Q. And you never talked about what you were going to be asked in this courtroom in any of those discussions, right?
A. Not to that effect, no.
Q. Did Mr. Feldman tell you he represents the Arvizos in either of those discussions?
A. I don't know what that is.
Q. Okay. So he never talked about his representing anyone associated with this case, besides you, right?
A. Correct.
Q. Now, you said something in response to the prosecutor's questions about your son changing the 5668

way he dressed at one point, right?
A. Correct.
Q. Didn’t your son used to try and dress like
Michael Jackson before he even met him?
A. When he was very young.
Q. Did you meet with the prosecutor before you
testified today?
A. Yes.
Q. When did you meet with the prosecutor to
talk about anything you said today?
A. Two days ago.
Q. And where was that meeting?
A. In downtown L.A.
Q. And who did you meet with?
A. With my attorney.
Q. And who is your attorney?
A. Brad Barnholtz.
Q. Who else did you meet with?
A. Tom Sneddon.
Q. Okay. How long a discussion was that?
A. Oh, perhaps an hour and a half.
Q. Did you talk about what you were going to
say today?
A. Yes.
Q. Did Mr. Sneddon go over some questions that
he was going to ask you?
A. Yes.
Q. Did you ever go over some answers that you 5669

were going to give?
A. Yes.
Q. When had you met with Mr. Sneddon before that meeting?
A. Never.
Q. Have you talked to him on the phone?
A. Yes.
Q. How many times?
A. Once or twice.
Q. Okay. Now, where did you first meet Michael Jackson?
A. At Rent-A-Wreck. The business of my ex-husband.
Q. And that was the day that Mr. Jackson had a problem with his car, right?
A. Yes.
Q. Okay. And when did you see him after that initial meeting?
A. I guess maybe approximately a few months after that.
Q. The first meeting was approximately August '92, right?
A. Correct.
Q. Okay. And when do you think the next meeting was?
A. Perhaps maybe in February.
Q. Okay. And again, how did that meeting happen? Who called who? 5670

A. How did the meeting --
Q. The second meeting. The first time you saw him when he had a problem with his car, right?
A. Correct.
Q. And then there was a meeting after that?
A. Right.
Q. How did that happen?
A. Through phone conversations with my son. And he -- and Michael Jackson invited us to Neverland.
Q. Okay. How did you get to Neverland?
A. By car. By my car. I drove.
Q. Okay. And did you stay over at Neverland that first time?
A. Yes, I did.
Q. How long did you stay?
A. I would say for two nights. One or two nights.
Q. Okay. And your daughter was there as well, right?
A. Yes, she was.
Q. Okay. And you said that you, your daughter, your son, stayed in the guesthouses, correct?
A. Correct.
Q. Now, what did you do during the day during that visit, during the two days you were there?
A. We watched movies. We went on rides. We visited his zoo. Things like that. 5671

Q. Okay. And how did you get home? Did you drive?
A. Yes, I did.
Q. When did you next talk to Michael Jackson after that?
A. Oh, I think probably the day after we got back.
Q. Did he call you?
A. Yes.
Q. Okay. Did you talk to him?
A. Yes.
Q. And when did you get together again?
A. Perhaps a week later. A week or two later.
Q. Did you go to Neverland again?
A. Yes, we did.
Q. How did you get there?
A. He drove. His -- sorry, his chauffeur drove.
Q. Okay. And did you stay over --
A. Yes.
Q. -- on that second trip?
A. Yes.
Q. And how long was your stay over there?
A. A couple of nights.
Q. Okay. Do you remember what you did on that second trip?
A. Same thing.
Q. Okay. Did you see Michael very often on the 5672

first trip?
A. The whole time, yes.
Q. Did you see him --
A. Yes.
Q. -- very often on the second trip?
A. Yes.
Q. When you said you went to the zoo and did these fun things, was Michael always with you?
A. The first and second time?
Q. Yes.
A. Basically, yes.
Q. Okay. Did you have dinner in the main house with Michael?
A. Yes.
Q. And of course your children were there too, right?
A. Correct.
Q. After that second trip, when did you next have contact with Michael, if you remember?
MR. SNEDDON: Your Honor, I'm going to object to the use of the first name.
THE COURT: All right.
MR. MESEREAU: I'll say "Michael Jackson," Your Honor.
Q. After your second visit to Neverland, did you have further contact with Michael Jackson?
A. Yes, I did.
Q. And please explain what your next contact 5673

1 was all about.
2 A. I don't know if that was the time we again
3 went to Neverland or we had taken a trip to Las
4 Vegas.
5 Q. Now, in your discussion with the Los Angeles
6 District Attorney in 1993, you talked about your
7 visits with Mr. Jackson, right?
8 A. Correct.
9 Q. Have you looked at that transcript recently?
10 A. Yes.
11 Q. When did you last look at the transcript?
12 A. Briefly, today.
13 Q. And how did you get a copy of it?
14 A. Through Mr. Sneddon.
15 Q. Okay. Did he ask you to read it today?
16 A. Did he ask me to read it today?
17 Q. Yes.
18 A. No.
19 Q. Did he ask you to read it at any time?
20 A. Yes, he did.
21 Q. And when was that?
22 A. Last week.
23 Q. Did he give you anything else to read before
24 you testified?
25 A. That's it.
26 Q. Okay. And did you read it from cover to
27 cover?
28 A. Tried. 5674

Q. Pardon me?
A. Yes.
Q. Okay. Okay. You told the District Attorney in Los Angeles when describing your first trip there, “Michael Jackson wasn’t the superstar. He was a regular person, and we couldn’t believe how nice he was,” right?
A. Correct.
Q. And you said that after you got there, he offered to let you stay over, correct?
A. Correct.
Q. Your plan initially wasn’t to stay over, right?
A. Correct.
Q. You said that first night, Jordie actually knocked at your door and said he was going to stay with you, right?
A. Correct.
Q. So the first night he stayed with you and your daughter, right?
A. Correct.
Q. Okay. Now, when did you go to Toys-R-Us with Michael Jackson?
A. Could have been the first visit or the second visit.
Q. Okay. And did Michael Jackson offer to take you there?
A. Yes. 5675

Q. And he did take you there, right?
A. Yes, he did.
Q. Did he drive or did you have a driver take you there, do you know?
A. We must have had a driver.
Q. Okay. Now, at one time, did you visit Roy Disney's widow with Michael?
A. Never.
Q. Okay. At some point you told the Los Angeles District Attorney that Michael was visiting Roy Disney's widow in Beverly Hills; do you remember that?
A. Not really, but I don't recall.
Q. Do you recall telling that to the Los Angeles District Attorney?
A. I don't recall.
Q. Would it refresh your recollection to let you see that page?
A. Yes.
MR. MESEREAU: May I approach, Your Honor?
THE COURT: Yes.
THE WITNESS: Thank you.
Q. BY MR. MESEREAU: Have you had a chance to look at that?
A. Yes.
Q. Does it refresh your recollection about what you told the Los Angeles District Attorney?
A. Yes. 5676

Q. And what did you tell them about that?
A. I said that I was -- we had left and Michael was -- I had left Neverland with Jordie and Lily, and he was going to visit Roy Disney's widow.
Q. Okay. Now, was that while you were visiting Neverland?
A. After we left.
MR. SNEDDON: Object as to vague as to time as to what visit.
MR. MESEREAU: I'll rephrase it.
Q. During what visit did Michael Jackson tell you he had to visit Roy Disney's widow?
A. The first visit.
MR. SNEDDON: Object as to hearsay.
THE COURT: Overruled.
Q. BY MR. MESEREAU: Was it the first visit?
A. I think so.
Q. Do you recall if you and your family stayed at Neverland while Mr. Jackson left the premises?
A. I don't recall that.
Q. Okay. Do you recall him making a trip like that?
A. Yes.
Q. Okay. You talked about gifts that Mr. Jackson gave you, okay?
A. Okay.
Q. Did you ever ask for any of those gifts?
A. No. 5677

Q. Did he just give them to you on his own initiative as far as you're concerned?
A. Yes.
Q. Okay. Tell us all the gifts you recall him giving you.
A. A gold bracelet. A pair of earrings. A necklace. A ring. A gift certificate to a boutique. That's what I recall.
Q. Okay. And you said he gave you his credit card to use?
A. Yes.
Q. Did he do that more than once?
A. He might have, yes.
Q. And do you recall what you bought with Michael Jackson's credit card?
A. I know I -- I think two handbags.
Q. Anything else?
A. Not that I recall, no.
Q. Okay. How many nights do you recall Mr. Jackson staying at your house?
A. To the best of my recollection, 30 nights.
Q. And approximately what time period was that, if you know?
A. Beginning the middle of April till the end of May.
Q. Were you at your house on every evening that Michael Jackson stayed over?
A. Yes. 5678

Q. You said something to the effect, I believe,
that Mr. Jackson would leave during the day?
A. Correct.
Q. Do you know where he went?
A. Not really. I --
Q. Did you ever ask him?
A. Sometimes.
Q. Okay. And where did he tell you he was
going?
A. Going home.
Q. To Neverland?
A. Working. No, not to Neverland. I think his
hideout, to his place that he calls “The Hideout” in
Century City.
Q. That’s the place you visited, correct?
A. Correct.
Q. How many times were you at that apartment?
A. Approximately three or four times.
Q. Okay. When you went to the apartment that
you’ve described as Michael Jackson’s hideout, were
you always with your son?
A. Yes.
Q. Were you ever with anyone else?
A. Not that I recall.
Q. Okay. You indicated you met someone named
Brett Barnes at Neverland, right?
A. Correct.
Q. Do you know when you first met him? 5679

A. It could have been the second time that we were going to Neverland.
Q. And he was actually in the limousine that Michael Jackson sent to pick you up, right?
A. Correct.
Q. Was that the first time you had met him?
A. Yes.
Q. Okay. Was that the trip you went to Disneyland?
A. It could be, yes.
Q. And was Brett Barnes with you on that trip?
A. I would assume so. I'm -- I don't recall.
Q. Do you know if his mother was there on that trip?
A. No.
Q. So it was you, Michael Jackson, your two children, and Brett, right?
A. Perhaps Brett.
Q. You're not sure?
A. Exactly.
Q. Did you go back to Neverland after the trip to Disneyland?
A. I don't recall.
Q. Okay. You indicated you met someone named Joy, right?
A. Correct.
Q. And when did you meet someone named Joy?
A. Later on, in -- could be May. April or May. 5680

Q. And where did you meet her?
A. At Neverland.
Q. Okay. Was she staying there when you stayed there?
A. Yes.
Q. And did she have a son, to your knowledge?
A. Yes, she did.
Q. And who was that?
A. Wade.
Q. Okay. How often did you see Joy Robeson and Wade Robeson at Neverland?
A. I remember seeing Joy once. And Wade, I -- it could be a few times. I don't recall.
Q. When you were at Neverland at the same time that they were there, did you associate with them?
A. Yes.
Q. Okay. And what did you do with them?
A. I had dinner with Joy, where we talked. And with Wade, if we went -- if there was a movie playing, I guess he was with us also.
Q. When Michael Jackson used to stay at your home, were you in the middle of a divorce proceeding?
A. No.
Q. Were you separated?
A. Yes.
Q. Did you used to discuss your problems with David Schwartz with Michael Jackson? 5681

A. Yes.
Q. You actually had a lot of discussions,
didn't you?
A. Not a lot.
Q. You told him it was a poor relationship,
didn't you?
A. What was a poor relationship?
Q. Your relationship with David Schwartz.
A. I told whom? I'm sorry.
Q. Michael Jackson.
A. Oh. No. I -- I don't -- I didn't get into
my relationship about David Schwartz to Michael.
Q. So you never discussed it with Michael
Jackson?
A. I just said that we were separated and these
were not wonderful times for us.
Q. And you would discuss with him from time to
time the problems you were having, wouldn't you?
A. No. No, I wouldn't.
MR. SNEDDON: Object as irrelevant, Your
Honor, not to mention hearsay.
THE COURT: Overruled. The answer was,
"No." Next question.
Q. BY MR. MESEREAU: During those 30 nights
that Michael Jackson stayed at your house, did he
have dinner at your house?
A. Yes.
Q. And was it usually you, he, your son and 5682

daughter at dinner?
A. At times.
Q. Who else would join you for dinner?
A. That's it.
Q. Did you ever have dinner yourself, without your children, just with Michael Jackson?
A. No.
Q. Have you ever traveled with Michael Jackson without your children?
A. No.
Q. When did you go to Las Vegas with Michael Jackson?
A. Around the end of March.
Q. And what was the purpose of that trip?
A. I guess Steve Wynn, the owner of the Mirage Hotel, invited Michael to come and stay and vacation in Las Vegas for a few days.
Q. And did you meet Mr. Wynn while you were there?
A. Yes, I did.
Q. How long were you in Las Vegas for that trip?
A. Two or three nights.
Q. And again, how did you get there?
A. Steve Wynn's jet.
Q. And did his jet take you back home afterwards?
A. Yes. 5683

Q. All right. When you went to Las Vegas on
Steve Wynn's jet, had Michael Jackson begun to stay
over at your home?
A. No.
Q. Did Michael Jackson begin to stay at your
home after that trip to Las Vegas?
A. Yes.
Q. Now, did you travel with Michael Jackson to
any other cities in America during this period of
time?
A. Yes.
Q. Where did you travel to?
A. To Florida and New York.
Q. Was that Orlando, Florida?
A. Correct.
Q. And when did that trip happen,
approximately?
A. Oh, approximately April, I guess.
Q. And what was the purpose of that trip, if
you know?
A. To go to Disney World.
Q. Did you do that?
A. Yes, we did.
Q. How long a trip was that?
A. A couple of days.
Q. And then did you come back?
A. Yes.
Q. The rooms in your hotel, describe the rooms, 5684

1 if you would.
2 A. I don't remember The Grand Floridian, what
3 the rooms were like.
4 Q. And did you have your own room?
5 A. Yes.
6 Q. Did Michael Jackson have his own room?
7 A. Yes, he did.
8 Q. And did your children have their own room?
9 A. I'm not sure.
10 Q. Do you know where your children stayed?
11 A. Yes.
12 Q. Where did they stay?
13 A. Jordie, my son, stayed with Michael, and
14 Lily stayed with me.
15 Q. And did you ever object, during that trip,
16 to your son staying with Michael?
17 A. No.
18 Q. You never suspected anything improper was
19 going on on that trip, correct?
20 A. Correct.
21 Q. You mentioned some children from New Jersey
22 that you met at Neverland, right?
23 A. Correct.
24 Q. And who were they again?
25 A. Frank and Eddie Cascio.
26 Q. Okay. And did you ever meet their parents?
27 A. No.
28 Q. When did you first see them at Neverland? 5685

A. I don’t recall. Could be the third visit to Neverland. Fourth visit.
Q. When was the first time your son Jordan asked if he could sleep with Michael Jackson?
A. I would say starting the third visit to Neverland, second or third visit to Neverland, because there were always boys around and staying in his bedroom, and why couldn’t he? And that’s when he started asking.
Q. And was it your understanding that there were a lot of kids hanging around Michael Jackson’s bedroom?
A. Yes.
Q. Did you see --
A. Boys.
Q. Excuse me. Did you see a lot of kids at Neverland while you were there?
A. A lot of Michael’s --
MR. SNEDDON: Excuse me. Object as to vague.
MR. MESEREAU: I’ll rephrase it. Let’s go through the first trip.
Q. Did you see a lot of kids at Neverland during your first trip?
A. No.
Q. Did you see a lot of kids at Neverland during your second trip?
A. No. 5686

Q. How many other children at Neverland did you see on your first trip?
A. No other kids on the first trip.
Q. How many kids at Neverland did you see on your second trip?
A. One.
Q. How about your third trip?
A. Third -- Frank and Eddie Cascio.
Q. Any other children on the third trip?
A. It could have been Macaulay Culkin also.
Q. Okay. Did you meet Macaulay Culkin at Neverland?
A. Yes.
Q. Macaulay Culkin doesn't look at all like your son, does he?
A. No.
Q. Did you meet Macaulay's parents?
A. Father.
Q. At Neverland?
A. Yes.
Q. And that was, you think, the third trip?
A. Could be. Could have been.
Q. Did you ever see him at Neverland again?
A. Yes.
Q. When did you next see Macaulay Culkin at Neverland?
A. Fourth or fifth visit.
Q. Was anyone else from his family there; do 5687

you know?
A. His brothers were there.
Q. Okay. Was it your understanding that the Culkins were good friends of Michael Jackson?
A. That Macaulay Culkin was good friends with Michael Jackson.
Q. What about his family? Was it your understanding his family were close friends of Michael Jackson?
A. Not close friends.
Q. Did you really know?
A. It didn't appear that they were close friends, no.
Q. Do you know if his parents used to visit Neverland?
A. His father used to visit Neverland with Macaulay.
Q. Did you hang out with them when you were at Neverland?
A. Did I hang out with --
Q. The Culkins.
A. No.
Q. Then how would you know whether or not they were close with Michael Jackson?
MR. SNEDDON: Your Honor, I'm going to object as argumentative.
THE COURT: Sustained.
Q. BY MR. MESEREAU: When you were in Las Vegas 5688

with Mr. Jackson, you went to Cirque du Soleil, correct?
A. No, I did not.
Q. Did your son?
A. Yes, he did.
Q. And did your daughter go as well?
A. To Cirque du Soleil?
Q. Yes.
A. No, she did not.
Q. Did you have any problem at that time letting your son go to Cirque du Soleil with Mr. Jackson?
A. No.
Q. And did your son stay with Mr. Jackson that evening, to your knowledge?
A. To my knowledge, yes.
Q. Okay. You told the prosecutor that Mr. Jackson got upset at one point about your not trusting him, right?
A. Correct.
Q. And he said words to you to the effect that, “We’re family,” right?
A. Correct.
Q. You suggested that you let Jordie sleep wherever he wants to sleep, right?
A. Yes.
Q. And you told him, “Look, I’ve had two husbands that I can’t trust,” right? 5689

A. Correct.
Q. You said, “I think you’re a wonderful person, but I can’t let my trust down,” right?
A. Correct.
Q. And you described Michael as saying that he was going to take care of you, right?
A. No.
MR. SNEDDON: Your Honor, excuse me, I’m going to object as vague as to point in time of the conversation.
MR. MESEREAU: Sure. Sure.
Q. When was the conversation where Michael got upset because he didn’t think you trusted him?
A. In Las Vegas in the hotel room.
Q. Okay. You said to Michael, “I’ve had males in my life that, you know, have disappointed me. How can I have you in my life and you’re saying that you’re going to take care of us, that you’re so wonderful, everything’s going to be okay, how am I going to do that?”
MR. SNEDDON: Your Honor, I’m going to object to counsel reading from the document.
MR. MESEREAU: I haven’t finished the question yet, Your Honor.
MR. SNEDDON: Well, he’s reading --
THE COURT: Well, all right, what is the question?
MR. MESEREAU: I was going to ask her if she 5690

made that statement.
THE COURT: All right. You may.
Q. BY MR. MESEREAU: Did you make a statement to that effect?
A. Yes.
Q. And Michael said to you he wanted a family to just treat him like a regular person, right?
A. Correct.
Q. He said he didn't want to be like a stranger, right?
A. Correct.
Q. And he asked you to trust him, right?
A. Yeah.
Q. Do you remember telling the District Attorney in Los Angeles that when you talked to your ex-husband Evan about Michael Jackson's relationship with your family, that Evan saw this as a wonderful means for Jordie not having to worry for the rest of his life?
A. Would you repeat your question?
Q. Yes. Didn't you tell the Los Angeles District Attorney that your ex-husband Evan, the father of Jordie, told you that the relationship with Michael was a wonderful means of Jordie not having to worry for the rest of his life?
A. Yes.
Q. And to you, that meant Michael Jackson supporting you financially for the rest of your 5691

life, correct?
A. No.
Q. That's what you thought your ex-husband meant by it, true?
MR. SNEDDON: Calls for speculation.
THE WITNESS: Speculation.
THE COURT: Sustained. Sustained.
(Laughter.)
Q. BY MR. MESEREAU: Just asking you what you thought, not what your ex-husband thought.
A. Well, I'm speculating also. I would be speculating if I answered.
Q. Well, if someone says to you, "This is a wonderful way not to have to worry for the rest of our life," doesn't that suggest that maybe someone is thinking about Michael Jackson supporting you?
MR. SNEDDON: Your Honor, I'm going to object. We just went through this. Calls for speculation.
THE COURT: Sustained.
Q. BY MR. MESEREAU: When did you go to France and Monaco with Michael Jackson?
A. In May.
Q. Did he invite you?
A. Yes.
Q. Did he invite your whole family?
A. Jordan and Lily, yes.
Q. At one point you said that Michael Jackson 5692

stayed at your ex-husband's house when Jordan was there, correct?
A. Correct.
Q. And to your knowledge, was your ex-husband at the house when Michael Jackson stayed there?
A. Yes.
Q. How many days, to your knowledge, did Michael Jackson stay at your ex-husband's house?
A. Approximately four to seven days.
Q. To your knowledge, was that consecutive or were they periodic visits?
A. Consecutive.
Q. And do you recall anything about your ex-husband wanting Michael Jackson to finance a wing on his house?
A. Yes.
Q. And to your knowledge, Michael Jackson never did that, right?
A. No.
Q. Now, at that point in time, Jordan's father Evan was writing a screenplay, right?
A. Correct.
Q. And to your knowledge, he was spending a lot of time on that screenplay, right?
A. Yes.
Q. And you were complaining that he wasn't spending enough time with his son, right?
A. Correct. 5693

Q. At the time you were happy that Michael was around, because Jordan's father was not spending time with him, and you were separated from David, correct?
A. True.
MR. SNEDDON: I'm going to object as to vague as to what time, time period. We have several months here.
MR. MESEREAU: Well, I can --
THE COURT: Sustained.
MR. MESEREAU: Okay.
MR. SNEDDON: Move to strike the answer.
THE COURT: Stricken.
Q. BY MR. MESEREAU: Did there come a time when you were happy that Michael Jackson was around, because your ex-husband Evan was spending time writing a screenplay and you were separated from David?
A. Correct.
Q. Approximately what -- when was that?
A. In the beginning I was happy.
Q. Okay. When did Michael go to Cartier and buy you that jewelry?
A. When we went to Las Vegas.
Q. Was he with you when he did that?
A. No.
Q. Did he do it on his own?
A. He did it with Jordie. 5694

Q. Okay. And did he come back and give it to you?
A. Yes.
Q. Okay. Now, you described that to the Los Angeles District Attorney as a love bracelet, did you not?
A. Yes.
Q. Is that what it was?
A. Yes.
Q. What is a love bracelet?
A. It's a bracelet that's a gold bracelet and that's what it's called.
Q. Okay. Had you ever told Michael Jackson you liked that kind of jewelry?
A. No.
Q. Were you surprised when he bought it for you?
A. Yes.
Q. Okay. Now, you mentioned that during that trip, you went to the David Copperfield show; is that right?
A. Correct.
Q. And who went to that show?
A. Jordan, Lily and Michael.
Q. Did the four of you have dinner that night together?
A. I don't recall.
Q. Okay. Did Michael give you his credit card 5695

on that trip?
A. No.
Q. Okay. At some point did you all see an Exorcist movie?
A. No.
Q. Do you recall anyone watching an Exorcist movie?
A. I was told Jordan and Michael watched an Exorcist movie.
Q. All right. Did you ever object to Jordie sleeping in Michael's room on that trip?
A. Yes.
Q. And what did you say?
A. "Jordie, when you come home, go to your bed. Go to your own bed. Come to our bed, not to Michael's bed."
He said, "Mom, I want to stay there." And I was very upset about that.
Q. Now, this was before the approximately 30 nights that he stayed at your home --
A. Yes.
Q. -- in Santa Monica, right?
A. Correct.
Q. And you did allow him to stay at your home in Santa Monica, right?
A. Afterwards.
Q. Now, you mentioned in your interview that when Michael Jackson's not working, he's a lonely 5696

1 person, correct?
2 A. Correct.
3 Q. And you also mentioned that the Cascios
4 owned a restaurant, true?
5 A. True.
6 Q. How did you know they owned a restaurant?
7 A. I was -- I don't recall how I knew.
8 Q. And do you remember telling the District
9 Attorney that Michael would help Jordie with his
10 homework?
11 A. Correct.
12 Q. Would he do that at your home?
13 A. Yes.
14 Q. You also said he played a lot like a child,
15 correct?
16 A. Correct.
17 Q. And he seemed to play at Neverland a lot
18 like a child, correct?
19 A. Yeah, yes.
20 Q. You mentioned Tommy and Merdie. Do you
21 remember that?
22 A. Yes.
23 Q. And who are Tommy and Merdie?
24 A. Merdie; are my brother and sister-in-law.
25 Q. Okay. At some point you stayed in Santa
26 Monica with them, correct?
27 A. Yes.
28 Q. Was Michael Jackson there? 5697

A. He was there.
Q. Did Michael Jackson stay with you at their home?
A. No.
Q. Did he stay at their home?
A. No.
Q. Did he stay at your home?
A. Not that time, no. Not at that time.
Q. And you stayed in Santa Monica with Tommy and Merdie?
A. Meredith. Merdie.
Q. Merdie, okay. You stayed with them at one point, right?
A. They stayed with me.
Q. Oh, they stayed with you?
A. Yes.
Q. Was Michael Jackson there that night?
A. I don't recall, no.
Q. Okay. To your knowledge, did Michael Jackson ever meet Tommy and Merdie?
A. I don't recall.
Q. Okay. Now, when Michael Jackson was staying at your home in Santa Monica during those 30 days that you mentioned, was Jordan in school?
A. Yes, he was.
Q. Was he going to school each day?
A. Yes, he was.
Q. Okay. You mentioned Steve and Jo Ellen. Do 5698

you remember that?
A. Do I remember mentioning --
Q. Mentioning Steve and Jo Ellen to the
District Attorney?
A. Yes.
Q. Who are Steve and Jo Ellen?
A. Steve is also my brother, and his wife Jo
Ellen.
Q. Did they visit you in Santa Monica during
the time that Michael Jackson was staying over?
A. No.
Q. You said that they witnessed Michael Jackson
and Jordie in the bedroom, didn't they?
A. Correct.
Q. When was that?
A. At Neverland.
Q. Did they stay there?
A. No.
Q. Okay. Did they go into Michael Jackson's
bedroom?
A. Yes, they did.
Q. And did you go into Michael Jackson's
bedroom?
A. Yes.
Q. How many times do you think you went into
Michael Jackson's bedroom at Neverland?
A. It stopped after maybe the tenth time.
Q. Okay. Describe, if you would for the jury, 5699

what Michael Jackson's bedroom looks like?
A. Lots of dolls. Lots of playthings. It looks like a boy's room, big boy's room. Lots of toys and things.
Q. Is it a big area?
A. Yes.
Q. How big would you describe it as, if you can?
A. Oh, it's a long time ago.
Q. Was it kind of huge?
A. Well, there's an upstairs and a downstairs. Yes, it's kind of huge.
Q. When you used to visit Michael Jackson's bedroom, would you see other people in there?
A. Yes.
Q. Who do you remember seeing in there?
A. The Cascio brothers. Macaulay. Brett. Wade.
Q. And you saw their parents in there, too, didn't you?
A. No.
Q. Did you ever see Macaulay's father in there?
A. In the bedroom?
Q. Yes.
A. No.
Q. And why were you in the bedroom those ten times?
A. Because I'm Jordie's mother. I'm allowed to 5700

go into the bedroom.
Q. Were you dropping clothes off?
A. Oh, I might have. I don't recall.
Q. Did you ever sit down and watch T.V. or
anything in there?
A. Yes.
Q. How often did you do that?
A. A few times.
Q. Did you ever have food delivered to you in
Michael Jackson's bedroom?
A. I don't recall.
Q. Okay. Did David Schwartz, to your
knowledge, ever visit Neverland?
A. No. No.
Q. Okay. When you were in Monaco with Michael
Jackson, what did you do?
A. We went to an awards ceremony. We -- well,
Jordie and Michael -- Jordie and Michael were sick,
so Lily and I went shopping and drove around. We
were driven around.
Q. Did Michael Jackson pay for the whole trip?
A. Yes, the trip was paid for. I don't know
who paid for it.
Q. To your knowledge, did Michael Jackson pay
for it?
A. No. No. It was an awards. I think he was
given tickets to attend this award because he was
receiving some kind of -- 5701

Q. Who paid for your hotel room, if you know?
A. I don't know.
Q. Now, you indicated that at one point Jordie and Michael had the flu, right?
A. Correct.
Q. And where did you find out they had the flu?
A. In the hotel room.
Q. And were they staying in the same room at that point?
A. Yes, they were.
Q. Did you ever complain about that?
A. Yes.
Q. And what happened?
A. The room was boarded up. I couldn't get in there. It started to get weird now. Things started to go downhill pretty quickly.
Q. Did you ever take your son and leave on your own?
A. No.
Q. After you got back from Monaco, did Michael Jackson spend nights at your home?
A. Yes.
Q. Were the 30 nights you've described after you got back from Monaco?
A. No.
Q. How many nights after you got back from Monaco do you think Michael Jackson stayed at your home? 5702

A. Oh, perhaps a week or two.
Q. And this was a point where you were getting upset that your son wanted to spend all of his time with Michael Jackson, right?
A. Yes.
Q. Now, while you were in Monaco, you never saw Michael Jackson and your son ever take a bath together, right?
A. No.
Q. You never saw them shower together, right?
A. No.
Q. And when did you go to France on that trip?
A. I think that was in May.
Q. And what was the purpose of that trip, if you know?
A. To get an award. He was receiving an award.
Q. Was that after the trip to Monaco or before?
A. I'm sorry?
Q. Was that after the trip to Monaco?
A. What was? What are you asking?
Q. The trip to France you described. Was there a --
A. That is the trip.
Q. That's the trip?
A. Yes.
Q. It was all in Monaco?
A. Monaco, yes.
Q. Did you ever go anywhere else? 5703

A. We went to Euro Disney also, outside of Paris.
Q. Was the trip to Euro Disney after you were in Monaco for the awards or before it, if you know?
A. To the best of my recollection, it was after the awards.
Q. And how much time did you spend on that portion of the trip?
A. I would say a couple of nights.
Q. Okay. Now, one point you visited Evan, Jordan's father, at his home when Michael Jackson was there, right?
A. I don't recall.
Q. Do you recall seeing Evan and Michael in a squirt-gun-type fight?
A. That was my home, sir.
Q. That was your home?
A. Yes.
Q. So Evan had come to your home at that point?
A. Correct.
Q. Okay. And Evan, Michael and Jordie were in a squirt gun fight, right?
A. Along with his other son Nicky.
Q. Okay. And you got upset a little bit at that, right?
A. Yes.
Q. Okay. How did you learn that Michael Jackson was going to stay over at Evan's house? 5704

A. Through my son Jordan.
Q. And approximately when did that occur?
A. After the trip to Monaco, I think.
Q. How many visits, to your knowledge, did Michael Jackson make to Evan's house?
A. To my knowledge -- to the best of my recollection, one or two visits.
Q. Okay. And to your knowledge, did he spend the night there?
A. Yes, he did.
Q. To your knowledge, did Jordan spend the night there?
A. Yes, he did.
Q. And to your knowledge, was Evan there both nights?
A. To the best of my knowledge, yes.
Q. Jordan never missed school while Michael Jackson was staying at your home, right?
A. To the best of my recollection, no, he did not miss school.
Q. Okay.
A. There might have been one or two days where he missed, but --
Q. Okay. You said that Michael Jackson saw you in New York at one point?
A. Yes.
Q. And when was that?
A. In June, the middle of June. 5705

Q. Was he staying at the same hotel you were at?
A. He arrived after we were there, yes.
Q. Did you know in advance he was going to be staying at the same hotel?
A. Yes.
Q. And how did you know he was going to be staying at the same hotel as you and your children?
A. His secretary informed me.
Q. Did he pay for those hotel rooms, to your knowledge?
A. I don’t know who paid for the hotel rooms.
Q. Did you?
A. No.
Q. And which hotel was this?
A. The Rega Royal Hotel in New York City.
Q. And how long did you stay at that hotel --
A. Oh, perhaps --
Q. -- on that trip?
A. -- four nights.
Q. Okay. Was Mr. Jackson there during the four nights, to your knowledge?
A. Part -- part of those nights, yes.
Q. Okay. And did you introduce Mr. Jackson to other members of your family on that trip?
A. I don’t recall.
Q. Did you mention your brothers were there on that trip? 5706

A. They were in New York, yes.
Q. Okay. Did they come to your hotel; do you know?
A. I don't recall.
Q. Okay. Do you know whether or not Michael met your brothers on that trip?
A. I don't recall that, no.
Q. Okay. And what month are we in now, if you know?
A. June. In June.
Q. Okay. And just to clarify, the first time Mr. Jackson ever stayed at your home in Santa Monica was what month?
A. In April.
Q. Okay. Do you remember telling Michael Jackson, "You're like a magnet?"
A. I don't recall.
Q. Do you remember telling Michael Jackson, "You're like Peter Pan. Everybody wants to be around you and spend 24 hours"?
A. Yes.
Q. You told him, "Lily would too, except she's not old enough"?
A. Yes.
Q. Now, you said there was an incident in a room in New York, right?
A. Correct.
Q. And did you actually see what happened? 5707

A. No.
Q. When did you learn what happened in the room?
A. In the morning I saw lamps, two lamps were broken.
Q. Okay. And Michael told you he had kicked the two lamps, right?
A. My son said that Michael Jackson did a karate kick and kicked the lamps.
Q. Actually, Michael told you that, too, didn't he?
A. I don't recall.
Q. Would it refresh your recollection to show you what you said to the District Attorney?
A. Thank you. Yes.
MR. MESEREAU: May I approach, Your Honor?
THE COURT: Yes.
THE WITNESS: Correct.
Q. BY MR. MESEREAU: Have you had a chance to look at that page?
A. Yes, I have.
Q. Does it refresh your recollection --
A. Yes.
Q. -- about what you said?
Michael told you he kicked the two lamps practicing karate, right?
A. Correct.
Q. And he said he would pay for it, right? 5708

A. Correct.
Q. And you said to him, “Lily told me a different story,” right?
A. Correct.
Q. But Lily told you they were just playing, correct?
A. Correct.
Q. Now, when do you remember meeting Bert Fields for the first time?
A. Sometime in August.
Q. Was Michael Jackson still spending evenings at your home in August?
A. No.
Q. When had he stopped spending evenings at your home, if you know?
A. I would say late June.
Q. And had you heard of who Bert Fields was before that meeting?
A. No.
Q. You weren’t aware he’s one of the best-known entertainment lawyers in Los Angeles?
A. I was told that by Michael Jackson.
Q. And how long was your meeting with Bert Fields?
A. I don’t recall. It could be an hour.
Q. And that’s where Mr. Pellicano was present?
A. I don’t recall.
Q. Okay. Is that the only time you’ve ever met 5709

with Bert Fields, to your knowledge?
A. I don't recall.
Q. In the sworn declaration you filed regarding your attempt to set aside that stipulation, is there any reason why you didn't mention Mr. Fields, Mr. Pellicano or Mr. Jackson in that declaration?
A. Is my -- I don't understand the question.
Q. That's where you said the only reason you signed the stipulation was because of what your ex-husband threatened you with.
A. Correct.
Q. But you told the jury initially that the reason you signed it was because Michael Jackson wanted you to sign it, true?
A. Correct.
Q. That's not contained in your declaration, is it?
A. No.
MR. SNEDDON: Objection. Asked and answered and argumentative.
THE COURT: Sustained.
Q. BY MR. MESEREAU: You didn't mention Mr. Fields or Mr. Pellicano either in that declaration, right?
MR. SNEDDON: Same objection, Your Honor.
THE COURT: Overruled.
Q. BY MR. MESEREAU: Right?
THE COURT: You may answer. 5710

1 THE WITNESS: Correct.
2 Q. BY MR. MESEREAU: When had you separated
3 from David Schwartz?
4 A. Around August of ‘92, approximately.
5 Q. Do you remember complaining that Evan,
6 Jordan’s father, had promised him money for helping
7 him write the screenplay?
8 A. Yes.
9 Q. And you complained that Evan had not paid
10 Jordan the money he owed him, true?
11 A. I didn’t complain. It was a statement.
12 Q. Well, you asked him to pay him the money,
13 right?
14 A. No, I did not.
15 Q. You didn’t tell him he owed your son $5,000?
16 A. It was a discussion.
17 Q. Okay. Did you want him to pay him that
18 money?
19 A. It would have been a nice thing, yes.
20 Q. He didn’t do it, did he?
21 A. No, he did not.
22 Q. Now, you mentioned a gift certificate for
23 $7,000 --
24 A. Yes.
25 Q. -- that you got from Michael Jackson, right?
26 A. Yes.
27 Q. And did you go to Fred Segal and use that
28 gift certificate? 5711

A. Yes.
Q. What did you get with it?
A. Oh, clothes, jewelry. That's it.
Q. That's it?
A. Yes.
Q. Okay. Before today, when is the last time you ever saw Mr. Jackson?
A. Oh, ten years ago.
Q. Okay.
A. Eleven years ago.
Q. Have you talked to Evan at all about what you're saying in court today?
A. No.
Q. When is the last time you spoke to him?
A. Ten years ago.
Q. To your knowledge, did Michael Jackson ever stay at David Schwartz's home?
A. No.
Q. Did he ever visit there, to your knowledge?
A. No. Not that I recall.
Q. Other than the first time when you met Mr. Jackson at David Schwartz's rental car company, do you recall ever seeing Michael Jackson meeting with David Schwartz?
A. No.
Q. Do you remember Evan threatening David physically?
A. Yes. 5712

Q. And when did that happen?
MR. SNEDDON: Your Honor, I'm going to object as immaterial.
THE COURT: Sustained.
Q. BY MR. MESEREAU: Approximately when did you get settlement money from the settlement with Michael Jackson?
A. Oh, I would say approximately October of '93.
Q. Have you received any settlement money since then?
A. No.
Q. You mentioned to the District Attorney in Los Angeles a meeting Michael Jackson had with Elizabeth Taylor and Nelson Mandela. Do you remember that?
A. Correct.
MR. SNEDDON: Your Honor, I object as immaterial.
THE COURT: Sustained.
Q. BY MR. MESEREAU: Do you remember, was Jordie with Michael at that meeting?
A. I don't recall.
Q. David Schwartz was also at the apartment that Michael Jackson owned in Century City that you called "The Hideout," right?
A. Correct.
Q. And approximately when was that meeting? 5713

MR. SNEDDON: Your Honor, I'm going to object as vague as to time. What meeting?
MR. MESEREAU: I'll rephrase it.
Q. When, to your knowledge, did David Schwartz visit Michael Jackson's home in Century City that you call "The Hideout"?
A. It could be late August, early September.
Q. Who else was there when you got to the apartment?
A. I don't recall who else was there.
Q. Do you remember in your meeting with Mr. Pellicano telling Mr. Pellicano, "Well, it's Michael Jackson. I know Evan. It could be money. It could be"?
MR. SNEDDON: Object as hearsay, Your Honor.
THE COURT: Sustained.
Q. BY MR. MESEREAU: Did you ever personally tell Mr. Pellicano that Evan's concerns could be only about money?
MR. SNEDDON: Same objection, Your Honor.
THE COURT: Sustained.
Q. BY MR. MESEREAU: Was your lawyer, Michael Freeman, at that meeting with Mr. Pellicano?
A. I believe so.
Q. Is that the same meeting Bert Fields was present?
A. I don't recall, but possibly. Quite possibly. 5714

Q. If your lawyer, Michael Freeman, was at the meeting, you must have been able to get legal advice about what to sign, right?
MR. SNEDDON: I'm going to object to that question. Assumes facts and calls for speculation. Can I throw in argumentative, too?
THE COURT: The objection is sustained.
Q. BY MR. MESEREAU: Did you ask Attorney Michael Freeman to be at the meeting?
A. No. I don't recall.
Q. Do you know how he got there?
A. I don't think he was there.
MR. SNEDDON: I'm going to object to that question. She has not said he was there. Assumes facts.
MR. MESEREAU: She did. She did.
THE WITNESS: I don't recall him being there.
THE COURT: Just a moment. Objection sustained.
Q. BY MR. MESEREAU: Who is Michael Freeman?
A. An attorney. My attorney.
Q. And when did you first meet Michael Freeman?
A. Oh, I don't recall when.
Q. Did he represent you at some point during the time period you've described today?
A. At some point, yes.
Q. And he was your personal lawyer -- 5715

A. Correct.
Q. -- is that right?
You mentioned -- actually, let me ask you this: Did you mention Norma Stakos earlier?
A. Yes, I did.
Q. Where did you meet Norma Stakos?
A. I've never met Norma Stakos.
Q. Have you ever spoken to her?
A. Yes.
Q. In what context did you speak to Norma Stakos?
A. By telephone, about where we should meet, or when Michael Jackson is coming in to New York, or things like that.
Q. Did she seem to be the person that arranged your trips?
A. Everything. Everything.
Q. Did she seem to be the person who would get plane tickets, for example?
A. Absolutely, yes.
Q. Would she be the person who would arrange transportation on your trips with Michael Jackson?
A. Yes.
Q. Okay. Do you remember at your meeting with Mr. Pellicano, that Mr. Pellicano said, "This is all extortion"?
MR. SNEDDON: Your Honor, I'm going to object to that question. Calls for hearsay. 5716

THE COURT: Sustained.
Q. BY MR. MESEREAU: Now, at the time you met Mr. Fields and Mr. Pellicano, to your knowledge, did Evan have his own attorney?
A. I don't recall.
Q. At some point during the time you were represented by Larry Feldman, do you recall Evan also having another lawyer?
A. I don't recall that.
Q. Do you recall the name Barry Rothman?
A. Yes.
Q. And where did you first hear about Barry Rothman?
A. Before Larry Feldman. That was Evan's attorney.
Q. Now, at some point were you represented by Attorney Gloria Allred?
A. Two seconds. For two seconds.
Q. It was a little bit more than that, wasn't it?
A. Two hours.
(Laughter.)
Q. You and Evan and Jordan were represented by Gloria Allred initially, correct?
A. Initially.
Q. You had meetings with her, correct?
A. One or two, yes.
Q. And then you went to Attorney Larry Feldman, 5717

right?
A. He came into the picture, yes.
Q. Okay.
A. Yes.
Q. Do you know approximately when Gloria Allred represented you, Evan and Jordie?
A. Before Larry Feldman.
Q. Do you know approximately --
A. No.
Q. -- what year that was?
A. Yes, '94.
Q. Okay. Were you referred to Gloria Allred by someone?
A. No.
Q. How did you wind up being represented by her?
MR. SNEDDON: Your Honor, I'm going to object as immaterial.
THE COURT: Sustained.
Q. BY MR. MESEREAU: How many times did you meet with Mr. Pellicano?
A. Approximately three times. Three to four times.
Q. Do you know where those meetings took place?
A. As far as I recall, in his office.
Q. Did you travel to his office?
A. Yes, I did.
Q. Were you there with your attorney, Michael 5718

Freeman, ever?
A. I don't think so, no, no.
Q. Did you have discussions with Mr. Pellicano?
A. Yes.
Q. Did you ever believe he was your
investigator?
A. Yes.
Q. And when was that?
A. When we had meetings.
Q. When you had meetings with Mr. Pellicano,
you had already retained Michael Freeman as your
lawyer, hadn't you?
A. I don't think so, no.
Q. What month do you think you first saw Mr.
Pellicano?
A. In August. Approximately August.
Q. The declaration I referred to earlier was
signed on August 10th, 1993, correct?
A. Okay. Yes.
Q. And it's on Freeman & Golden, Lawyers,
stationery, correct?
A. I guess so.
Q. Would it refresh your recollection if I show
you the declaration?
A. Thank you.
MR. MESEREAU: May I approach, Your Honor?
THE COURT: Yes.
THE WITNESS: That's correct. 5719

Q. BY MR. MESEREAU: (Indicating.)
A. Thank you.
Q. Have you had a chance to look at the declaration?
A. Yes.
Q. And does it appear that that declaration was signed August 10th, 1993?
A. Yes, it was.
Q. And it's on Freeman & Golden, Lawyers, stationery, correct?
A. Correct.
Q. And your lawyer helped you prepare this declaration, true?
A. Correct.
Q. Was Michael Freeman representing you in your domestic dispute with Evan?
A. No. I don't recall. I don't recall.
Q. When did he stop representing you, if you know?
A. Shortly thereafter. Not --
Q. Okay. Now, was Michael Freeman representing you when Gloria Allred was representing you?
A. I don't recall.
Q. Was Michael Freeman representing you when Larry Feldman was representing you?
A. No.
Q. Do you recall at one point meeting with Robert Shapiro? 5720

A. Yes.
Q. And when was that?
A. In Larry Feldman's office.
Q. How many meetings did you have with Robert Shapiro?
A. I don't recall.
Q. Do you know why he was at the meeting?
A. I -- I think as part of Michael Jackson's legal team.
Q. Who, Robert Shapiro?
A. I think so. I don't recall.
Q. Okay.
A. It was so long ago.
Q. Well, he was there because Michael Jackson's attorneys were claiming extortion, right?
A. I don't recall.
Q. Robert Shapiro was there because he's a criminal defense lawyer, right?
MR. SNEDDON: Your Honor, excuse me. I want to interpose an objection before the next question comes out. Speculation. She says she doesn't have any recollection of this, so why Mr. Shapiro --
THE COURT: Stop talking. You're just supposed to give your grounds for the objection.
MR. SNEDDON: I'm sorry. Object. Speculation.
THE COURT: All right. Overruled. The question -- the last question, would the 5721

court reporter read it back, please?
(Record read.)
THE COURT: You may answer.
THE WITNESS: Correct.
Q. BY MR. MESEREAU: Do you remember also in your meetings, meeting -- excuse me, let me rephrase that.
In the meetings you've described with Larry Feldman, Michael Freeman, Robert Shapiro, do you also remember a lawyer named Richard Hirsch being present?
MR. SNEDDON: Your Honor, I'm going to object as to all those people and compound.
THE COURT: It's vague.
We'll take our break now.
(Recess taken.)
THE COURT: Mr. Mesereau.
MR. MESEREAU: Thank you, Your Honor.
Q. Just very briefly, you and Evan hired attorneys and tried to negotiate a financial settlement before you ever talked to any police officer, right?
A. No.
Q. You were negotiating for money before you ever reported anything to any police officer in Los Angeles, correct?
A. Not correct.
Q. Do you know the dates you hired your 5722

attorneys?
A. After we spoke with the police.
Q. You're saying that under oath?
A. That's what I believe, yes.
Q. You don't know that for sure, do you?
A. I'm sure.
Q. Your negotiations went on long before you ever went to any police officer in Los Angeles, true?
A. False.
Q. Do you know when you first went to any police officer?
A. After the police, after we spoke to the police.
Q. It was after you spoke to Larry Feldman on a number of visits, correct?
A. Not correct.
Q. It was actually Larry Feldman who contacted the police, wasn't it?
A. No.
Q. You didn't talk to any prosecutor in Los Angeles before you retained Gloria Allred, correct?
A. Yes. Correct.
Q. You didn't talk to any police officer in Los Angeles before retaining Gloria Allred, correct?
A. Can you backtrack a bit? Can you --
Q. You retained Gloria Allred before you ever contacted any police officer in Los Angeles, true? 5723

A. Not true.
Q. Who did you contact in the LAPD before you hired Gloria Allred?
A. The police department. LAPD.
Q. You didn't give any police statement before negotiations had already begun to settle the case, true?
A. Not correct.
Q. Did you call them yourself?
A. Did I call?
Q. The police yourself?
A. Department of Children Services.
Q. How about police?
A. No. Department of children Services.
Q. I'm asking you about the police.
MR. SNEDDON: It's argumentative, Your Honor.
THE COURT: Overruled.
Q. BY MR. MESEREAU: You were negotiating for money --
THE COURT: Just a minute.
MR. MESEREAU: Oh, pardon me.
THE COURT: All right. She did answer it before the objection. Go ahead, Counsel, next question.
Q. BY MR. MESEREAU: You said you contacted Department of Children Services, correct?
A. Yes. 5724

Q. That's not the police department, is it?
MR. SNEDDON: That's argumentative, Your Honor. And assumes facts not in evidence.
THE COURT: Sustained; argumentative.
Q. BY MR. MESEREAU: And you contacted Department of Children's Services after first talking to a lawyer, true?
A. Not correct.
Q. In fact, you personally never called the police department, ever, about anything involving Mr. Jackson, true?
A. True.
Q. When did you first hire Gloria Allred?
A. After we spoke to the District Attorney.
Q. When did you first hire Larry Feldman?
A. After the police were notified, Department of Children's Services, and Lauren Weis, the District Attorney.
Q. Your strategy was to negotiate a settlement before ever contacting law enforcement, true?
A. No strategy, sorry.
Q. And one of the levers you were trying to hang over Mr. Jackson was bad publicity if he didn't pay, right?
A. Incorrect.
Q. Okay. When you talked to Mr. Sneddon, did he ever show you the dates when you contacted your first lawyer in this case? 5725

A. No.
Q. When you talked to Mr. Sneddon, did he ever show you the dates before any contact was ever made to a police officer?
A. No.
Q. Do you know when your civil case was first filed?
A. I'm not sure of the exact date.
Q. Do you know who filed it?
A. I'm not exactly sure. Sorry.
Q. Okay. Do you know when you first contacted Department of Children's Services?
A. Sometime in August.
Q. You don't know when you hired Gloria Allred, correct?
A. Correct.
Q. Do you know if Gloria Allred contacted Department of Children Services?
A. I don't know that.
Q. Do you know when Evan first hired Barry Rothman?
A. I do not know that.
Q. He hired Barry Rothman before any report was made to DCFS, correct?
A. I don't know.
MR. SNEDDON: I'm going to object. Calls for speculation.
THE COURT: Sustained. 5726

1 Q. BY MR. MESEREAU: When did you first hire
2 Attorney Michael Freeman?
3 MR. SNEDDON: Object as asked and answered.
4 THE COURT: I believe she said she didn't
5 know.
6 MR. MESEREAU: Okay. No further questions.
7 THE COURT: All right.
8
9 REDIRECT EXAMINATION
10 BY MR. SNEDDON:
11 Q. Mrs. Chandler, do you know whether or not in
12 Los Angeles, that the Los Angeles Police Department
13 has sworn peace officers attached to the Child Abuse
14 Unit in the Department of Child Services?
15 A. Correct.
16 Q. Sorry?
17 A. Yes, I do.
18 Q. Were those the people that you talked to
19 when you were interviewed?
20 A. Yes, they were.
21 Q. And do you have a recollection at this
22 present time as to specifically when in August you
23 interviewed with them?
24 A. Specifically, no.
25 Q. Would it refresh your recollection if I
26 showed you a document about that interview?
27 A. Yes.
28 MR. SNEDDON: May I approach, Your Honor? 5727

THE COURT: Yes.
THE WITNESS: Okay. Thank you.
Q. BY MR. SNEDDON: Does that refresh your recollection?
A. Yes, it does.
Q. With regard to -- I'm sorry, to when you were interviewed by members of the Los Angeles Police Department?
A. Yes, it does.
Q. And what was the date on that?
A. 8-7-93.
Q. Now, let's go back, if we can. And just to clarify, you were not the one who originally contacted the -- made the report?
A. Correct.
Q. Do you know who did, of your own knowledge?
A. Of my knowledge, it was Jordan Chandler, my son.
Q. Now, let's go back for just a second. Mr. Mesereau asked you about a meeting on Saturday involving your attorney and myself. Do you recall that?
A. Yes, I do.
Q. And was there also another person that was present with us that I brought along?
A. Yes.
Q. Do you remember the person's name?
A. No, I don't remember his name, but he was a 5728

1 detective.
2 Q. With the sheriff's department?
3 A. With the sheriff's department.
4 Q. So he was also present during that entire
5 meeting?
6 A. He was -- absolutely, yes.
7 Q. All right. Now, he also asked you about
8 conversations that you and I had on the phone. Do
9 you recall that?
10 A. Correct.
11 Q. And that we had talked a couple of times on
12 the phone?
13 A. Correct.
14 Q. And with regard to those conversations, the
15 first conversation we had, do you recall the
16 substance of that conversation?
17 A. That I would be subpoenaed and for --
18 testifying.
19 Q. And did I indicate to you that I wanted to
20 talk to you, to do an interview with you?
21 A. That we would be speaking later on, yes.
22 Q. Okay. And did you -- did you have to check
23 with somebody to make sure that was okay because of
24 the confidentiality agreement?
25 A. Yes.
26 Q. And who was that?
27 A. Larry Feldman.
28 Q. So is that one of the phone calls that you 5729

had with Mr. Feldman, was to make sure --
A. Yes.
Q. -- to make sure it was okay for you to talk
to me?
A. Correct.
Q. Now, Mr. Mesereau asked you about some
countersuit that Michael Jackson alleged against you
and members of your family. Do you recall that
question?
A. Yes.
Q. Did you ever pay a penny to Mr. Jackson in
any lawsuit to settle anything?
A. No. No.
Q. Now, you indicated that these two children
from New Jersey that you mentioned, the Cascios, do
you remember the name of the restaurant in New
Jersey that they allegedly owned?
A. Aldo's Restaurant.
Q. You talked with Mr. Mesereau about the
incident that occurred in New York where the lamps
got broken and the karate kicks and all that?
A. Correct.
Q. Okay. Did you subsequently learn that the
version of what happened was not truthful?
MR. MESEREAU: Objection; leading.
THE WITNESS: Correct.
THE COURT: Sustained. The answer's
stricken. 5730

1 Q. BY MR. SNEDDON: Did you subsequently -- can
2 you tell us how you eventually -- let me put it this
3 way: Did you ultimately learn other information
4 about that incident?
5 A. Yes.
6 Q. You personally?
7 A. Yes.
8 Q. And did you determine from that information
9 that the original version wasn't correct?
10 A. Correct.
11 Q. We talked a little bit in your direct
12 examination about the change-in-custody agreement
13 that Mr. Jackson asked you to sign. Do you recall
14 that?
15 A. Yes.
16 Q. Okay. And you said you did sign it?
17 A. I did.
18 Q. Now, after having signed that document, did
19 you ever get custody of your child back?
20 A. No.
21 Q. Mr. Mesereau asked you about your son Jordan
22 and about some things you may or may not have seen
23 with regard to taking showers. And I want to ask
24 you a few questions about that, okay?
25 A. Yes.
26 Q. During the time that you were -- you stayed
27 at Neverland Valley Ranch, and your son slept in Mr.
28 Jackson's room - okay? - did you ever see your son 5731

come back to the guest cottages to take showers?
A. No.
Q. During the time that your son was in Monaco and stayed in Mr. Jackson's room for several days in a row, did you ever see your son come back to take showers in your room?
A. No.
Q. During the time that you were in Florida and Mr. Jackson and your son spent the time together and he was sleeping in Mr. Jackson's room, did you ever see your son come back to your room to take showers or to clean up?
A. No.
Q. And if I were to ask you that same question with regard to baths - okay? - would there be any different answers?
A. No.
Q. Or with regard to seeing your son getting dressed in the morning, would there be any different answers?
A. No.
Q. Now, with regard to the meeting that Mr. Mesereau talked about, where you were at the hideout, Mr. Jackson's hideout, the Century City place -- in Century City? I don't know where it is.
A. Yes, it is.
Q. And we're talking about the evening that you described where Mr. Pellicano was talking to Jordan 5732

1 downstairs and you were upstairs with David
2 Schwartz.
3 A. Correct.
4 Q. You told us that lasted about 45 minutes?
5 A. Yes, it did.
6 Q. Do you recall whether or not Mr. Jackson was
7 present during that conversation?
8 A. I don't recall him being there.
9 Q. Now, if I show you your statement that you
10 gave to the Los Angeles District Attorney's Office,
11 might that refresh your recollection to that event?
12 A. Yes.
13 MR. SNEDDON: May I, Your Honor?
14 THE COURT: Yes.
15 MR. SNEDDON: Page 90, Counsel.
16 THE WITNESS: Thank you.
17 Q. BY MR. SNEDDON: Does having seen that
18 statement refresh your recollection as to whether or
19 not Mr. Jackson was present with Mr. Pellicano
20 during Jordan's conversation or interview?
21 A. Yes, it does.
22 Q. And was he?
23 A. Yes, he was present.
24 Q. You told the jury that it's been 11 years
25 since you've had any conversations with your son
26 Jordan, correct?
27 A. Correct.
28 Q. Is that by your choice? 5733

A. No.
Q. You told the jury that as a result of the conversation with Mr. Jackson in Las Vegas where he urged you to trust him - okay? --
A. Yes. I'll be okay. Thank you.
Q. -- that during that conversation in Las Vegas where Mr. Jackson urged you to trust him, do you recall that?
A. I do.
Q. Do you regret ever doing that?
A. Very much so.
MR. SNEDDON: Nothing further.

RECROSS-EXAMINATION
BY MR. MESEREAU:
Q. Briefly, do you recall Evan hired counsel in June to start negotiating with Mr. Jackson?
A. No, I don't recall.
Q. Do you recall being in any meetings with Evan and his counsel in June to try and settle the matter?
A. No.
Q. Do you recall Mr. Pellicano making settlement offers to Evan on your behalf in June?
A. No, I don't.
Q. Do you recall any contact between Evan and lawyers in May?
A. No. 5734

Q. Okay. You never discussed that with Evan at the time?
A. No.
Q. Didn't you have a lot of -- we're talking about 1993. Didn't you have a lot of contact with Evan at that point about hiring counsel?
A. No.
Q. And weren't you in a dispute with Evan at that point over custody?
A. Yes.
Q. Okay. And when did that dispute begin, if you know?
A. In August of '93.
Q. But you had had problems with Evan for months before that, had you not?
A. Not -- not terrible.
Q. And you don't know when he hired his attorney?
A. No, I don't. No, I don't.
MR. MESEREAU: Okay. No further questions.
MR. SNEDDON: Nothing further, Your Honor.
THE COURT: All right. Thank you. You may step down.
THE COURT: Call your next witness.
MR. AUCHINCLOSS: People call Dwayne Swingler.
THE COURT: When you get to the witness stand, please face the clerk and raise your right 5735

1 hand.
2
3 DWAYNE SWINGLER
4 Having been sworn, testified as follows:
5
6 THE WITNESS: Yes, ma'am.
7 THE CLERK: Please be seated. State and
8 spell your name for the record.
9 THE WITNESS: My name is Dwayne Swingler;
10 D-w-a-y-n-e, Swingler, S-w-i-n-g-l-e-r.
11 THE CLERK: Thank you.
12
13 DIRECT EXAMINATION
14 BY MR. AUCHINCLOSS:
15 Q. Good afternoon, Mr. Swingler.
16 A. Good afternoon.
17 Q. What is your current occupation, sir?
18 A. Right now I do stand-in work, movie sets.
19 Q. Okay. And what kind of -- stand-in work,
20 what does that --
21 A. Stand in for stars. It's called second
22 team. They don't use the stars to get the lights
23 bright. They use stand-ins.
24 Q. I see. During the year 2003, at some point
25 during that year, did you -- were you employed by
26 Michael Jackson?
27 A. Yes, sir.
28 Q. Is he the man seated to my right with the 5736

long black hair?
A. Yes, sir.
Q. Thank you.
When did you begin working for Mr. Jackson?
A. In June of 2003. Early June of 2003.
Q. And what was your -- what was your
assignment for Mr. Jackson?
A. Supervisor of Neverland.
Q. How did you come to get that position?
A. I met Michael at a studio, Marvin Gaye's
studio in Hollywood.
Q. What were you doing at the studio?
A. My cousin was engineering Michael's music
session, and Michael needed someone to whistle on a
track, so my cousin called me and said, "Would you
like to come down and whistle on Michael's track?"
And I said, "I can't whistle that well, but I would
love to come down and meet Michael Jackson."
Q. Okay. Are you yourself a musician?
A. Yes, I am.
Q. And you met Mr. Jackson on that date?
A. Yes, sir.
Q. Can you tell me about -- was that in 2003?
A. Yes, it was.
Q. About what month was it, if you recall?
A. That was probably early -- sometime in
April.
Q. And how did it come about that you were 5737

offered employment?
A. I hung out at the studio with Michael and his kids, and Chris Carter, maybe four, five days in a row, three, four days in a row, while they were working on the session.
Q. Who did you understand Chris Carter to be?
A. Michael's personal security.
Q. And so somebody offered you employment?
A. On the last day there, Chris Carter asked me to come outside. So I walked outside with him, and at that time he told me that, you know, "Michael likes you. He would love to bring you aboard. What are you currently doing right now"?
Q. Were you available?
A. Yes.
Q. Did they tell you what type of job they wanted to hire you for?
A. Initially they hired me to be security, along with Chris Carter, to travel with Michael.
Q. And how did that work out?
A. Well, that didn't work for me because I had triplets. I got three-year-old triplet boys, so....
Q. All right. So traveling wasn't an option?
A. No. Actually, Michael was the one who said, "If he has triplet boys, then I don't want him to be traveling with me all the time."
Q. So you said you became ranch manager?
A. Yes. 5738

Q. How did that come about?
A. I guess Michael suggested to Chris, “If he has triplets, he’ll be away from his kids a lot. So maybe we should offer him another job,” and that’s when supervisor of Neverland came up.
Q. So who offered you that position, I guess is my question?
A. I guess Michael. But Chris Carter’s the one who told me about the position.
Q. At some time did you discuss with Mr. Jackson personally your employment?
A. I don’t understand the question.
Q. Did you ever have a discussion with Mr. Jackson about your employment as ranch manager?
A. Yes, I did.
Q. Did he ever discuss with you the terms by which you could be terminated if he was dissatisfied with your work?
A. He didn’t discuss with me personally. But Chris Carter and Joe Marcus did.
Q. And did you have an understanding about how you could be terminated?
A. Yes.
Q. And what was that?
A. Grounds of giving up information of where Michael Jackson’s whereabouts are, and, you know, there was a rule on the ranch -- I don’t know if it came directly from Michael, but, you know, Chris 5739

told me and Joe Marcus told me as well, that you can never say no --
MR. MESEREAU: Objection; hearsay.
MR. AUCHINCLOSS: Okay, let's just back up a minute.
Q. I think what my question is, did you know -- did you have some indication from Mr. Jackson as to who had authority to terminate you?
A. Yes.
Q. And who was that?
A. From my understanding, it was only supposed to be Michael Jackson.
Q. Okay. At some point during 2003, were you terminated?
A. Yes.
Q. Tell me about that. How did that come about?
A. I had --
MR. MESEREAU: Objection; vague as to time.
THE COURT: I'll ask you to clarify the time.
MR. AUCHINCLOSS: Okay.
Q. When were you terminated?
A. Early August 2003.
Q. And how long had you been working at that point for Mr. Jackson?
A. Maybe five, six weeks.
Q. When did you start work?
A. I was hired in the end of April, early May. 5740

But I had to go back to Michigan for a couple of weeks, so the hiring process took awhile. You know, background checks, physicals.
Q. When did you start going to Neverland?
A. In May.
Q. In May?
A. Yeah.
Q. And when did you start getting a paycheck?
A. In June.
Q. Okay. And what were you doing there in May?
A. I just came out to the ranch to check things out to see the position that I would be, you know, filling.
Q. In May, was it understood that you would be the ranch manager?
A. Yes.
Q. And did you go up there and receive some instruction from anybody as to what the duties were, in May?
A. I received, well, sort of from Joe Marcus, some instruction, but not as much as I did once I started in June.
Q. What was Mr. Marcus's assignment at that time?
A. Ranch manager.
Q. So he was ranch manager and you were going to take it over?
A. No. Ranch manager, you deal with the 5741

majority of the workers outside, the garden, the landscapers, things like that. The carnival, the festival, whatever.
Q. What was Joe Marcus doing?
A. What do you mean?
Q. Well, you said Joe Marcus was ranch manager.
A. Right, that was his position. Ranch manager, you deal with all the employees basically outside of the house.
Q. And your position was going to be?
A. Supervisor. Deal with the employees and Michael and the kids in the house.
Q. Oh, in the house?
A. Yes.
Q. So house manager?
A. House manager.
Q. All right. Good.
So you began work in June, but you went up there for how many weeks to get some training?
A. Not really training, just sort of to come check things out, and to see who -- you know, what position I would be taking and where the office was, and things like that.
Q. And when was it you were terminated?
A. In early August.
Q. And how did that come about?
A. I had had a meeting with Michael about transferring my position. And I liked working for 5742

him. I wanted to work for him somewhere in Los Angeles, because my triplets were only one years old at the time. So I was missing them, them being in Los Angeles and me being here, and me staying the night at Neverland often. Wasn't working for me. So I had a one-on-one meeting with him to be transferred.

Q. And how did your termination come about?

A. I --

Q. Let me ask you this: Were you terminated?

A. Yes, I was.

Q. And how were you terminated?

A. I was terminated by Joe Marcus. He -- I arrived at Neverland one morning for work and he told me -- he had changed the locks on me. And then I went into -- I mean, some -- one of the employees -- one of my employees in the house told me Joe came to change the locks. And I said, "Why?" And they said, "I don't know." And I had already been told by the guard at the gate that Joe --

MR. MESEREAU: Objection; hearsay.

THE COURT: Sustained.

Q. BY MR. AUCHINCLOSS: So the locks were changed. Did you go talk to Mr. Marcus?

A. Yes, I did.

Q. What did he tell you?

MR. MESEREAU: Objection; hearsay.

THE WITNESS: He told -- 5743

MR. AUCHINCLOSS: I can go back to my last question, I guess. I'll withdraw that question, Your Honor.
THE COURT: All right.
Q. BY MR. AUCHINCLOSS: And how specifically -- I want you to go directly to the answer on this question. How specifically did you learn that you were terminated?
A. I --
MR. MESEREAU: Objection; asked and answered.
THE COURT: Overruled.
You may answer.
Q. BY MR. AUCHINCLOSS: Go ahead.
A. I learned directly from Joe Marcus that my services would no longer be needed at Neverland, and that he didn't have to give me a reason. Because I --
Q. You asked him for a reason?
A. Yes, I did. I didn't think I had done anything wrong. Well, I know I hadn't done anything wrong.
Q. Okay. So you'd been at Neverland for a little over a month, and you'd worked there for a few weeks before that time as well?
A. Well, not worked. But like -- I wasn't getting paid for that time. That was just to come out there and check the ranch out. 5744

1 Q. During the time that you were at Neverland,
2 did you have personal interaction with Michael
3 Jackson?
4 A. Yes.
5 Q. On how often a basis?
6 A. If he was there. All the time, if he was
7 there.
8 Q. More than once a day?
9 A. Yes.
10 Q. And who was responsible for handling Mr.
11 Jackson's appointments while he was on the ranch?
12 A. At Neverland, I would take the -- all the
13 phone calls. It didn't matter who it was calling;
14 mother, father, business person.
15 Q. So if he had an appointment for a day, would
16 you take that -- would that be part of your duties?
17 A. Yes.
18 Q. To schedule those appointments?
19 A. Yes.
20 Q. Did you have occasion to observe visitors of
21 Mr. Jackson that were child visitors?
22 A. Yes.
23 Q. Did you see child visitors spend the night
24 at Neverland?
25 A. Yes.
26 Q. Did you see child visitors spend the night
27 in Mr. Jackson's room?
28 A. Yes. 5745

MR. MESEREAU: Objection. Leading; and
violates the Court's order.
THE COURT: Sustained.
Q. BY MR. AUCHINCLOSS: Who did you see visit
Mr. Jackson who was a child visitor?
MR. MESEREAU: I'm going to object.
Violates the Court's order.
THE COURT: Sustained.
Q. BY MR. AUCHINCLOSS: When you were at
Neverland, did you interact with Mr. Jackson about
issues dealing with activities on the ranch?
MR. MESEREAU: Objection; vague.
THE COURT: Overruled.
THE WITNESS: Issues dealing with activity on
the ranch?
Q. BY MR. AUCHINCLOSS: Well, whatever -- let's
back up. What were your duties as house manager?
A. To answer all the phone calls. To, you
know, schedule the maids. To help the maids out
with cleaning rooms and suites. And basically to,
you know, take care of whatever Michael and the kids
needed.
Q. And in terms of the day-to-day issues in
terms of running the ranch, can you characterize
how -- Mr. Jackson's degree of involvement?
A. As far as -- I mean --
MR. MESEREAU: Objection. Vague; and
relevance. 5746

THE COURT: Overruled.
You may answer.
THE WITNESS: Mr. Jackson is in total charge of the ranch.
Q. BY MR. AUCHINCLOSS: Why do you say that?
A. Well, when I was terminated, because of my previous conversation with Chris Carter that only Michael Jackson could terminate me, I called Evvy, which is Michael's personal assistant --
MR. MESEREAU: Objection. Nonresponsive; hearsay.
MR. AUCHINCLOSS: That's fine.
MR. MESEREAU: And relevant as to time.
THE COURT: Sustained.
Q. BY MR. AUCHINCLOSS: So when you were on the ranch, did you have occasion to see Mr. Jackson in terms of making orders at the ranch?
A. Yes.
Q. Did he make orders?
A. Yes. He made some to me.
MR. MESEREAU: Continuing relevance objection, Your Honor, as to time.
THE COURT: Time?
Q. BY MR. AUCHINCLOSS: During the time that you were ranch manager, during that five-week period.
A. Yes.
MR. MESEREAU: That's the objection, Your 5747

Honor. The time period's irrelevant.
THE COURT: All right. That's overruled.
Q. BY MR. AUCHINCLOSS: Go ahead. You can answer that question.
A. Yes, I observed it. He made some to me personally.
Q. Did you have occasion to see individuals, his other employees, in terms of their relationship with Mr. Jackson?
A. Meaning like Joe Marcus and Grace and those?
Q. I mean -- let's talk about your employees. Did you have employees that were working under you as house manager?
A. Yes.
Q. Who?
A. Cooks?
Q. Yeah, just generally speaking.
A. Cooks, housekeepers, maids.
Q. Okay. And had some of these people been working at the ranch longer than you had?
A. Yes. The majority of -- all of them.
Q. And did you have occasion to see their interaction with Mr. Jackson?
A. Yes.
Q. And what level of service did Mr. Jackson expect?
MR. MESEREAU: Objection. Relevance; vague; no foundation. 5748

THE COURT: It's vague; sustained.
Q. BY MR. AUCHINCLOSS: Can you characterize the demeanor of the employees around Mr. Jackson when they were in his presence?
MR. MESEREAU: Objection. Vague; relevance. Particularly the time period.
MR. AUCHINCLOSS: I'll be specific.
Q. During the time you were ranch manager, or house manager.
MR. MESEREAU: Same objection.
THE COURT: Overruled.
THE WITNESS: Can you ask me the question again?
Q. BY MR. AUCHINCLOSS: Yeah. My question is, can you characterize the demeanor -- how did these people act, these employees, when they were around Mr. Jackson in his presence?
A. I mean, they act like they liked him. Mr. Jackson was nice to people.
Q. Did they act like they'd speak their mind around him?
MR. MESEREAU: Objection; leading.
THE COURT: Sustained.
Q. BY MR. AUCHINCLOSS: Did they act -- did they act comfortable around him?
MR. MESEREAU: Objection. Leading; vague; relevance; and foundation.
THE COURT: Sustained. 5749

Q. BY MR. AUCHINCLOSS: Do you know if -- do you know if Mr. Jackson would fire people at Neverland?
MR. MESEREAU: Objection. Foundation; relevance.
THE COURT: Foundation; sustained.
Q. BY MR. AUCHINCLOSS: Well, you yourself were fired; is that correct?
A. Yes, sir.
Q. Do you know who fired you?
MR. MESEREAU: Objection; asked and answered.
THE COURT: Sustained.
Q. BY MR. AUCHINCLOSS: Who -- when you were working with Mr. Jackson, did you have occasion to see individuals who were employees of his that were closer than other employees?
MR. MESEREAU: Objection. Vague; leading; relevance; foundation.
MR. AUCHINCLOSS: Objection, Counsel's fishing for a reason to object to that question.
MR. MESEREAU: I object to the colloquy, move to strike.
THE COURT: I'll sustain the "vague" objection to that question.
Q. BY MR. AUCHINCLOSS: Did you see employees -- did you see any employees that spent more time with Mr. Jackson than other employees? 5750

MR. MESEREAU: Objection. Leading; vague; foundation; and relevance.
THE COURT: Overruled.
You may answer.
THE WITNESS: Yes, I did.
Q. BY MR. AUCHINCLOSS: Did you see -- well, let's go ahead and make a list. Who did you see that spent more time with Mr. Jackson than other employees?
MR. MESEREAU: Objection. Relevance; foundation; vague.
THE COURT: Overruled.
You may answer.
THE WITNESS: Vase -- Grace, I'm sorry. Grace, Chris Carter. Those are the two that I think spent most of the time with Mr. Jackson.
Q. BY MR. AUCHINCLOSS: Did you ever see an individual visit the ranch by the name of Dieter Weizner?
A. I would have to see a picture to be sure.
MR. MESEREAU: Could we approach, Your Honor? We'd like a proffer.
MR. AUCHINCLOSS: Be happy to make one.
THE COURT: I don't really need that. I -- it's clear to me where....
Q. BY MR. AUCHINCLOSS: I show you People's Exhibit No. 17, Mr. Swingler. Can you identify that for me, please? 5751

A. I can't say I've seen that gentleman.
Q. You haven't seen him?
A. No.
Q. Did you see -- did you previously have a conversation with Detective Bonner about the facts of this case?
A. Yes, sir.
Q. And in that conversation, did you identify -- just a moment, if you would, please. Did you identify a number of individuals that you thought were within Michael Jackson's inner circle?
MR. MESEREAU: Objection. Leading; and vague.
MR. AUCHINCLOSS: It's impeachment.
THE COURT: Sustained.
MR. AUCHINCLOSS: I'm sorry?
THE COURT: It's vague.
Q. BY MR. AUCHINCLOSS: Did you identify Dieter Weizner as a member of Michael Jackson's inner circle?
MR. MESEREAU: Objection. Leading; and foundation.
THE COURT: Overruled.
You may answer.
THE WITNESS: In my conversation with Detective Bonner?
Q. BY MR. AUCHINCLOSS: With Detective Bonner, 5752

1 did you not identify Dieter Weizner specifically as
2 a member of Michael Jackson's inner circle?
3 A. I can't -- I can't really recall, because I
4 don't know the face. I never seen the face before.
5 The name I know. The face I don't.
6 Q. Do you know the name Dieter Weizner?
7 A. Yes.
8 Q. Did you meet a man by the name of Dieter
9 Weizner?
10 A. Looking at the face --
11 Q. I'm not asking you about the face.
12 MR. MESEREAU: Objection. He's arguing with
13 the witness. Leading and foundation.
14 THE COURT: Overruled.
15 Q. BY MR. AUCHINCLOSS: Did you meet a man by
16 the name of Dieter Weizner?
17 A. I can't remember.
18 Q. Did you meet a man -- well --
19 A. Like I say, the name sounds familiar. I
20 know I've heard the name. Maybe I spoke with him on
21 the phone a few times there, but the face didn't --
22 MR. MESEREAU: Objection. Calls for
23 speculation; move to strike; nonresponsive.
24 Q. BY MR. AUCHINCLOSS: Did you meet a man by
25 the name of Ronald Konitzer?
26 THE COURT: There's an objection pending.
27 THE BAILIFF: Judge, can you turn the
28 microphone on? 5753

THE COURT: All right. The objection is overruled. And you had another question. Go ahead.
Q. BY MR. AUCHINCLOSS: Did you meet a man by the name of Ronald Konitzer?
A. I can't -- by the name -- I would have to see a picture.
Q. Did you meet two German businessmen?
A. Yes.
Q. Did they meet with Mr. Jackson?
A. Yes.
Q. On how many occasions?
A. Three or four.
MR. AUCHINCLOSS: Thank you. I have no further questions.
THE COURT: Cross-examine?

CROSS-EXAMINATION
BY MR. MESEREAU:
Q. Good afternoon.
A. Good afternoon.
Q. My name's Tom Mesereau. I speak for Mr. Jackson.
A. How you doing, sir?
Q. Good. Good. We've never spoken before, right?
A. No.
Q. You worked for a five-week period?
A. Four and a half, five weeks, yes, sir. 5754

Q. Four and a half, five weeks. How many days
a week did you work?
A. Six or seven.
Q. And the prosecutor asked you about how many
meetings Mr. Jackson had with two German
individuals, right?
A. Yes, sir.
Q. Do you really know how many meetings there
were?
A. Around, I'm guessing, three to four.
MR. MESEREAU: Okay. Move to strike the
testimony, Your Honor.
THE COURT: Denied.
Q. BY MR. MESEREAU: You're guessing three to
four, but you don't really know, right?
A. No, I couldn't say. I couldn't pinpoint it.
I wasn't --
Q. You weren't in the meetings, right?
A. No.
Q. You don't remember what they looked like,
right?
A. I do remember what they looked like if I saw
a picture of them, yes.
Q. Well, the picture the prosecutor showed you,
you couldn't identify, right?
A. Yes, sir.
Q. Okay. Now, you wanted to be transferred to
Los Angeles; is that correct? 5755

A. Yes. Yes, sir.
Q. And did you tell -- excuse me, who did you talk to about the transfer?
A. Mr. Jackson.
Q. Okay. And you explained that the commute and the hours were just too much to raise your family?
A. I just wasn't seeing my kids, and they were one years old.
Q. And did you ask Mr. Jackson to be transferred somewhere in Los Angeles?
A. Yes.
Q. Okay. And where was that?
A. I just asked him to be transferred to any business in Los Angeles that he had.
Q. But you really didn't even know if there was a job available in Los Angeles, right?
A. No, that's why I was asking.
Q. Okay. Right. Okay. And approximately when did you ask him; do you know?
A. Maybe three weeks into the job.
Q. Okay. And Mr. Jackson was always nice to you, wasn't he?
A. Yes, sir.
Q. And as far as you know, there may not have been a job available in Los Angeles, right?
A. He told me there was one.
Q. He told you there was one? 5756

A. Yes, sir.
Q. Where did he say?
A. A&R, his record label.
Q. Pardon me?
A. A&R of his record label.
Q. Had you ever worked at a record label before?
A. No, I hadn't.
Q. All right. But at some point you learned that you weren't being hired, right?
A. No. As a matter of fact, I saw Michael again at his birthday party in Los Angeles and he told me I was still hired.
Q. Okay. But it never came through, right?
A. No, I'm still waiting for my paycheck now.
Q. Okay. You're trying to write a book about your experiences at Neverland, correct?
A. Well, no, I'm not trying to write a book about my experiences at Neverland.
Q. Well, didn't you -- excuse me. Did you say Michael Jackson has a record label?
A. He told me he had a record label.
Q. Okay. Do you know that he doesn't have one?
MR. AUCHINCLOSS: Objection; assumes facts.
THE COURT: Sustained.
Q. BY MR. MESEREAU: Do you know whether or not he really has a record label?
A. I was just told by him he had a record 5757

label.
Q. Okay. All right. Now, you prepared notes for a book called “Entering Neverland, Secrets Behind the Gate,” right?
A. Does it have my signature on it? Because I know that within the last month or two, I started jotting down information to myself and somehow my information come up missing out of my house, but whatever.
Q. Did you prepare notes for a book titled “Entering Neverland, Secrets Behind the Gate” --
A. No.
Q. -- “By Dwayne Swingler, Head Supervisor of Neverland Ranch, Summer of 2003,” did you prepare that?
A. No.
MR. AUCHINCLOSS: Objection; asked and answered.
THE COURT: Overruled. The answer is, “No.”
Q. BY MR. MESEREAU: Are you aware of anything like that?
A. No.
Q. You didn’t --
A. Am I aware of it? What do you mean?
Q. Yeah. Have you written out anything for a book called “Entering Neverland, Secrets Behind the Gate, by Dwayne Swingler”?
A. No, I haven’t written anything, or titled 5758

anything, or signed anything, or spoke to anybody
about, “This is my deal.”
Q. Have you talked to a group called News of the World?
A. Have I?
Q. Yes.
A. Yeah, I spoke with one lady one time, yes.
Q. And to your knowledge, who is News of the World?
A. To my knowledge, it’s a news media overseas.
Q. And why were you speaking to them?
A. Because I was interested in maybe possibly writing down some information to -- to cash in on something like everybody else was, because Michael wasn’t -- I hadn’t received the paycheck from A&R at the time.
Q. Okay. Did you enter into a nondisclosure agreement with News of the World?
A. No, I did not.
Q. Have you ever seen one?
A. No, I did not.
Q. Did you ever talk to someone named David Han-Schmidt?
A. The same time I spoke with the News of the World lady, he’s the one that contacted her and contacted me.
Q. And to your knowledge, who is David Han-Schmidt? 5759

A. He said that he was a media agent. I don't even know how he got my phone number.
Q. When did you last talk to David Han-Schmidt?
A. He -- as a matter of fact, he called me today.
Q. And to your knowledge, is he with a public relations company?
A. I really don't know what he did. He never clarified that with me. He said he was an agent, he was a producer, he was in public relations. I basically ended the situation.
Q. To your knowledge, did anyone ever send you a nondisclosure agreement regarding News of the World?
A. No. I haven't signed any nondisclosure agreements, and I haven't taken any money from anyone.
Q. How many discussions have you had with David Han-Schmidt?
A. Three. Four. Can't remember.
Q. And when was the last one with him? Today?
A. He called me today, because he said he heard that I was coming to testify.
Q. Okay. Have you ever put together any notes for a possible book on the computer?
A. Excuse me?
Q. Have you ever put any notes for a possible book on your computer? 5760

A. No, I haven't.
Q. Have you ever written any notes out for a possible book?
A. I told you I jotted down some information on a piece of paper, and that's all I've done.
Q. Did you ever ask any public relations person to put together a proposal for you?
A. No, I haven't.
Q. But you're thinking of doing it, right, like everybody else?
A. Yes, I was thinking about doing it.
Q. Okay. Okay. Have you ever seen -- excuse me. Has anyone ever brought to your attention that somebody has prepared notes for a possible book in your name?
A. David.
Q. David Han-Schmidt?
A. Yes.
Q. Did he prepare them, to your knowledge?
A. He just said he received papers. I don't know -- like I told you, I don't even know how he got my phone number.
Q. Okay. If I showed you these papers, might it refresh your recollection about where they came from?
A. No, it probably wouldn't, because I never typed any papers or wrote out -- the only thing I did was write down notes, jotted down notes on a 5761

1 piece of paper.
2 Q. Okay. And that was about your experience
3 during the five weeks at Neverland?
4 A. That was about my experience totally, not
5 just the five weeks at Neverland. That was my
6 experience with Michael's manager and everything.
7 Q. Okay. Did you ever write down on those
8 notes the words "Secrets Behind the Gate"?
9 A. No, I did not.
10 Q. Okay. Did David Han-Schmidt tell you how he
11 got your name?
12 A. No, he did not.13 Q. Okay. Did you ever ask him, "Why did you
14 call me?"
15 A. Well, actually, he started the conversation
16 off, and he just, whew, went straight to talking
17 about a lot of money, so I was listening to him
18 about a lot of money first.
19 Q. Did he promise you a lot of money?
20 A. That's what he promised, yes.
21 Q. Okay. How much money did he promise?
22 A. He never said figures. He just said, you
23 know, "You can make a lot of money." You know, "Why
24 aren't you telling anyone your story?" That's what
25 he said to me.
26 Q. It's your understanding that he's located in
27 Phoenix, Arizona?
28 A. Yes. That's where he said he's from. 5762

Q. Okay. Did he ever tell you he was going to prepare a possible manuscript for you?
A. He asked me would I like him to, and I said no. Like I told you, I terminated the conversation when he told me what he wanted to do.
Q. Okay. And did he want some scandal sheet about Michael, something like that?
A. Actually, he's for Michael. He's pro Michael.
Q. Did he want you to write something about Michael?
A. He wanted to speak on Michael's behalf, yes.
Q. Okay. And how often -- in those three conversations, did you talk about money each time?
A. No, I did not.
Q. Okay. Have you ever spoken to Miss Carol Maung, M-a-u-n-g, who is the U.S. editor of News of the World?
A. I spoke with her. I spoke with her when she was with David when I got there.
Q. And did she fax you anything or e-mail you anything?
A. Fax me anything or e-mail me anything?
Q. Yes.
A. No, sir.
Q. Okay. All right. When you were at Neverland working --
A. Yes. 5763

Q. -- you had no direct contact with any member of the Arvizo family, right?
A. The Arvizo family?
Q. Yes.
A. No, sir.
Q. That means you didn't have any contact with the Arvizos?
A. Yes.
Q. Okay. Do you remember meeting Dominick Cascio at Neverland?
A. Yes, sir.
Q. And he's the -- did you speak to him?
A. Often.
Q. Okay. And to your knowledge, he's a father?
A. He's a father?
Q. Yes.
A. I didn't know he was a father.
Q. Okay. Did he ever talk to you about work he did?
A. Did Dominick ever talk to me about work he did?
Q. Yeah.
A. Some work at the restaurant that his family owned.
MR. MESEREAU: Okay. I have no further questions, Your Honor.
MR. AUCHINCLOSS: Counsel?
(Off-the-record discussion held at counsel 5764

1 table.)
2 MR. AUCHINCLOSS: Maybe we should approach.
3 Your Honor, may we approach?
4 THE COURT: For what?
5 MR. AUCHINCLOSS: Concerning the materials
6 that counsel is using to cross-examine the witness
7 on.
8 THE COURT: All right.
9 (Discussion held off the record at sidebar.)
10 MR. AUCHINCLOSS: If I could just have a
11 moment, Your Honor.
12 THE COURT: Yes.
13 MR. AUCHINCLOSS: I think I can finish with
14 this witness, Your Honor. Just one question.
15
16 REDIRECT EXAMINATION
17 BY MR. AUCHINCLOSS:
18 Q. Mr. Swingler, do you know if David Schmidt
19 has any affiliation with Michael Jackson?
20 A. I just know that he has a website; that
21 he's, you know, pro Michael Jackson.
22 MR. AUCHINCLOSS: All right. Thank you.
23 I have no further questions.
24 MR. MESEREAU: No further questions, Your
25 Honor.
26 THE COURT: All right. Thank you. You may
27 step down.
28 THE WITNESS: Thank you, sir. 5765

THE COURT: Do you have another witness?
MR. AUCHINCLOSS: (To Mr. Sneddon) Go ahead.
MR. SNEDDON: You.
MR. AUCHINCLOSS: Do you want me to do it?
(Laughter.)
MR. SNEDDON: We're trying to figure out which one of us should take responsibility for telling you "No."
(Laughter.)
MR. SNEDDON: And being the great delegator I am, I'm leaving it up to Gordon.
MR. AUCHINCLOSS: We have no further witnesses, Your Honor. We just anticipated that there would be -- it would take a little longer to get through these witnesses today.
THE COURT: All right. There's a couple of items that we can take up. I'll go ahead and excuse the jury.
(To the jury) Remember the admonitions I've given you and I'll see you tomorrow morning at 8:30. But it's a half day tomorrow, remember. How could you forget, right?

(The following proceedings were held in open court outside the presence and hearing of the jury:)

THE COURT: All right. First, there was -- my understanding is that the special master will have the report available tomorrow morning for you on the computer hard drives.
MR. SNEDDON: On both of them, Your Honor?
THE COURT: Yes. They're working on some last-minute details. So it will be available tomorrow morning.
MR. SNEDDON: Now, at that point, then, Your Honor, does it need to go to you for final decision, or is that the decision?
THE COURT: I don't know. I haven't read the report. I was handed a rough draft of one by my research attorney this morning -- well, not this morning, a few minutes ago. And I asked him to talk to Mr. Sanger about an issue. So I can't answer your question.
MR. SNEDDON: Okay.
THE COURT: I suspect it doesn't need to go beyond what's been done by the special master, so --
MR. SNEDDON: Okay.
THE COURT: But I won't know till I've looked at it.
The second thing is that both of you have submitted points and authorities on Janet Arvizo. The District Attorney's I've read. And I just received the defense, so I haven't had time to read yours. 5767

When do you expect to call Janet Arvizo?
MR. ZONEN: Either tomorrow or Wednesday.
Depending on if we finish the witnesses scheduled
before her tomorrow. If not --
THE COURT: They can't hear behind you.
(To the audience) He said either tomorrow
or Wednesday.
MR. ZONEN: As early as tomorrow.
THE COURT: As early as tomorrow.
Okay. Well, I'm not really prepared to deal
with that issue. We'll have to deal with it before
she's called, but I'll need to study the material
you've given me, the defense has given me.
MR. ZONEN: Thank you.
THE COURT: Was there anything else pending?
MR. SANGER: On that issue, Your Honor, as I
explained to you, as I explained to your clerk, we
were served with their papers this morning. We
thought they might call Ms. Arvizo today.
THE COURT: Right.
MR. SANGER: So we put something together
very quickly, and I would like to have an
opportunity to explain to the Court a little more,
in a little more organized fashion, where this goes,
now that we've had a few more minutes to think about
it.
THE COURT: I'll make sure you have that
opportunity. 5768

MR. SANGER: Okay. Thank you.
THE COURT: All right. Then we'll recess until tomorrow morning.
(The proceedings adjourned at 2:30 p.m.)
--o0o--

REPORTER'S CERTIFICATE

THE PEOPLE OF THE STATE)
OF CALIFORNIA,)
Plaintiff,)
-vs-) No. 1133603
MICHAEL JOE JACKSON,)
Defendant.)

I, MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304, Official Court Reporter, do hereby certify:

That the foregoing pages 5582 through 5769 contain a true and correct transcript of the proceedings had in the within and above-entitled matter as by me taken down in shorthand writing at said proceedings on April 11, 2005, and thereafter reduced to typewriting by computer-aided transcription under my direction.

DATED: Santa Maria, California, April 11, 2005.

MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304